



COMMENT RESPONSE DOCUMENT NPA FOR DCP 2024-003 – DASR UAS

INTRODUCTION

1. This Comment Response Document (CRD) provides summaries of consultation and final amendments resulting from the [Notice of Proposed Amendment](#) (NPA) for the *Defence Aviation Safety Regulation - Uncrewed Aircraft Systems (DASR UAS) DASR Change Proposal (DCP) 2024-003*.
2. DASA released NPA 2024-003 for regulated community comment on 23 Oct 25 and the period for comment closed on 05 Dec 25. DASA consulted with respondents to resolve NPA feedback where relevant.

ANALYSIS OF COMMENTS

3. DASA received 140 comments to the NPA for DCO 2024-003 from across the aviation safety community. Those comments and DASAs responses are individually listed in Annex A.

Environmental command endorsement

4. Environmental command HQs advised the proposal was acceptable if DASA made the changes detailed in Annex A. DASA accepted and incorporated the majority of feedback into the revised regulation, and provided the revised draft to each environmental command HQ. Environmental HQs subsequently endorsed the updated DASR UAS, which will be published in July 2026.

Transition plan

5. Refer to Advisory Circular 003/2026 *DASR UAS transition* for details of the DASR UAS transition requirements.

Contact

5. Members of the aviation safety community can contact DASA through DASA.UAS@defence.gov.au for advice and further detail if required.

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Sep 26

Annex:

- A. DASR UAS Comment Response Document to NPA for DCP 003-2024



DASR UAS Comment Response Document to NPA for DCP 003-2024

LSN	Updated DASR Reference	Unit or Organisation	Comment or suggested change	Further Explanation where provided	DASA response
1	UAS.30(b)	Navy FAA	The level of prescription for a (eg) 2kg UAS is overly burdensome. Recommend a 'carve-out' for this CRE of UAS.	Further discussion identified that a limited BVLOS permission in UAS.40 could account for the type of user identified by HQFAA.	<i>DASA expanded the visual options to account for the situations where an RP can maintain credible visual awareness of other Aircraft and within electronic line of sight, but the UA may not be within VLOS. The additional options are provided for lower ground population densities</i>
2	Glossary	Navy FAA	Change reference in "Defence Controlled Ground or Water" to GM.UAS.10 from GM3.UAS.10		<i>Error rectified in final draft.</i>
3	AMC UAS.10(b)4	Navy FAA	AMC UAS.10(b).4 Management of UAS OIP This section is too onerous for sub 2kg COTS UAS that will only operate IAW an ATOUAS and OEM Instruction Manual. Suggest the AMC be contained to sub para a. with the remainder moved to GM and word 'contextualised' added. Alternatively, UAS.40 could also be excluded from this AMC.	Small UAS and potentially experimental/developmental UAS are unlikely to be able to comply with this list, that is more appropriate for larger more complex MOTS type UAS (eg US DoD group 3). Typical sub 2kg UAS operate to an ATOUAS, RMP and OEM Instruction Manual only. This is appropriate for very low risk UAS, particularly when constrained appropriately, such as below 400' over non-populated areas etc.	<i>DASA de-limited the 12 month period to enable UAS Organisations the flexibility to define a period contextualised to their operating context. Subsequent discussion with FAA identified that the remainder of the AMC is suitable for all categories.</i>
4	GM UAS.30.a(a)2.v	Navy FAA	GM UAS.30.a(a)2.v - FMS (AUS) This section has useful information regarding Spec B and Open Cat FMS requirements - but only appears under Spec A (ie UAS.30.a). It would be beneficial for this info to be apparent in UAS.30.b and UAS.40. Alternately, elevated to UAS.10.		<i>The UAS.30.a reference is added to UAS.30.b to provide the guidance identified by FAA. Nil reference added for UAS.40 as this section is intended to contain all the relevant information in parallel to UAS.10 without further reference to other categories.</i>
5	AMC UAS.30.b(a)3v	Navy FAA	AMC UAS.30.b(a)3v - UAS Crew Qualification, Training, Experience and Medical Standards sub para a.iv - Aircraft Captancy This AMC provides an extensive list of requirements that may not be achievable by small COTS UAS. Recommend addition of the phrase 'contextualised for the size/complexity of the UA'.	Addition of 'contextualisation' allows for scaling of the AC requirements to suit the operating complexity and context of the UAS.	<i>UAS.40 permissions are slightly expanded (see LSN 1) to accommodate more of the small COTS capabilities. Additionally, some training may be beneficial for sections of the community less experienced in applying DASR UAS.</i>
6	AMC UAS.30.b(a)3v	Navy FAA	AMC UAS.30.b(a)3v - UAS Crew Qualification, Training, Experience and Medical Standards sub para b. Remote Crew medical... This sentence does not appear to mandate a requirement. Suggest this should be a sub para of a.		<i>Error corrected. Moved back under paragraph a. as a sub-paragraph.</i>

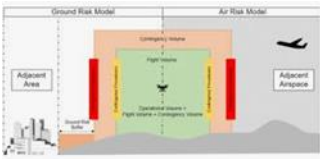


DASR UAS Comment Response Document to NPA for DCP 003-2024

LSN	Updated DASR Reference	Unit or Organisation	Comment or suggested change	Further Explanation where provided	DASA response
7	GM UAS.30.b(a)3vi	Navy FAA	GM UAS.30.b(a)3vi - Operating Standards and limitations (AUS) .This is an extensive list and may be significantly more than is appropriate for small COTS UAS. Though is GM, suggest adding text such as 'where relevant' throughout. Alternately, change 'include' to 'consider' throughout.		See LSN 5 for the response to similar commentary.
8	GM UAS.30.b(a)3vi	Navy FAA	GM UAS.30.b(a)3vi - Operating Standards and limitations (AUS) sub para a. Reference to 'operations manual template'. An operations manual is part of the CASR requirements, which are a common area of confusion amongst ADF RPs that have done RePL. Suggest using military phraseology such as 'SOPs' to indicate distinct differences of DASRs vs CASRs.	Navy experience shows confusion amongst personnel who have done CASA RePL training and do not fully understand the differences operating under DASRs. Making artefacts sound like CASA related documents may exacerbate the issue.	Amended to Approval to Operate UAS template given this extant Service instrument provides similar material.
9	GM UAS.30.b(a)3vi	Navy FAA	GM UAS.30.b(a)3vi - Operating Standards and limitations (AUS) sub para c.States 'independent verification of safety critical data'. What qualifies as 'independent verification'?		DASA will investigate addressing this feedback through DASR UAS training for the Aviation Safety community.
10	AMC1 UAS.30.b(a)3vi.a	Navy FAA	AMC1 UAS.30.b(a)3vi.a Airspace Integration sub para b.i.(f) States 100' AGL out to 2nm. This is incongruent with CASR mandated 400' AGL rules for segregation. It is well known in GA that UAS may operate up to 400' AGL almost anywhere. Recommend this be changed to 400' for alignment and simplicity.		Amended, refer to LSN 112.
11	GM UAS.30.b(a)3vi.a	Navy FAA	Sub para g.i.(a) Non-controlled' is stated, whereas it should state 'controlled'		Drafting error corrected.
12	AMC UAS.30.b(a)3vi.b	Navy FAA	sub para a. 'determination' should read 'determine'		Error corrected.



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13	AMC UAS.30.b(a)3vi.b	Navy FAA	sub para b.iii The AMC discusses 'red area'. This would benefit from being discussed as a ground risk buffer (per SORA definitions) and addition of elevation view of the SORA Operational, Contingency and ground risk buffer areas.		<i>The extant terminology for 'red area' is retained for simplicity. An additional diagram is placed in this section to provide the 'side view' of the areas at risk.</i>
14	AMC UAS.30.b(a)3vi.b	Navy FAA	sub para c Use of the phrase 'maximum operational airspeed' is inconsistent with Standard Scenarios which use the phrase 'maximum commanded speed'.	Also contained in GM UAS.30b(a)3.vi.b sub para a.ii.(a)	<i>DASA amended the UAS.35 and UAS.36 limitations to permit AUOs to use 'maximum commanded' vs standard UAS Organisations who must use 'maximum possible commanded'. See LSN 128 for further detail.</i>
15	AMC UAS.30.b(a)3vi.b	Navy FAA	Figure 2Shape of the 'adjacent area' is incorrect and should mirror the shape of the contingency area.		<i>Figure 2 (now 3 in the final version) is amended to reflect a more accurate concept application.</i>
16	AMC UAS.30.b(a)3vi.b	Navy FAA	Figure 4 is incorrectly labelled figure 3. It is also missing the Contingency Area and Ground Risk buffer in the diagram		<i>Both errors corrected.</i>
17	AMC UAS.30.b(a)3vi.b	Navy FAA	sub para g. An extra space lies between the words 'organisation' and 'must'		<i>Error corrected.</i>
18	GM UAS.30b(a)3vi.b	Navy FAA	sub para a.iii.(c) This would benefit from additional guidance to assist with determination of which metric to use. Suggest adding text to state 'the most probable UA failure profile to be considered to determine the descent profile to be used...'		<i>Wording amended to include guidance regarding consideration of the most likely failure modes.</i>
19	UAS 30.b	Navy FAA	All AMC and GM Due to the variety of UAS that can be covered by UAS.30.b, it is important that the AMCs and GM allow for contextualisation to account for different risk profiles and complexities. Phrases such as 'contextualised', 'commensurate' or 'where relevant' should be included on most of the AMC and GM.	The level of compliance with the AMC would subsequently be analysed during audits / AwBs.	<i>No further amendment was made, although pre-NPA work converted portions of AMC to GM. This comment is likely to be best addressed through education to the aviation safety community.</i>



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20	UAS.30.b	Navy FAA	The 30.b regulation currently reads as though it targets the middle of the spectrum (ie US DoD Group 3) which may be too much for small UAS without an ability to selectively apply requirements.	Noting the large prevalence of small COTS UAS in use, it would be beneficial to have either a sub 2kg SS with commensurately reduced requirements, or add increased operating flexibilities to UAS.40. Reduced administrative overheads and more simplistic operating policy is required to support increased usage of small UAS. Higher levels of regulation should be reserved for increased levels of risk. Resource requirements must be kept low for very low risk UAS to make them viable, particularly for non-aviation units that are resource challenged (eg patrol boats).	<i>This feedback is addressed through the modifications made for LSN 1, where the expansion of visual permissions in UAS.40 enables the majority of users mentioned in the feedback to operate under UAS.40 instead of UAS.30.b standard scenarios.</i>
21	UAS.35(a)	Navy FAA	AMC UAS.35(a)2iii This AMC is extremely detailed with no ability to apply scaling. It would be burdensome to use for simple UAS, or those being used for a one off demonstration activity. Eg. Navy demo of a Pterodynamics X-P4 from JBAF, transiting over the BNP to the EAXA. Suggest the AMC be changed to 'the UAS Organisation should establish a maintenance system contextualised for the UAS to ensure airworthiness' with existing AMC moved to GM.		<i>DASA investigated this issue with FAA and identified that the extant pathways for NDR and AUOs were sufficient to cater for the types of activities identified by FAA without burdensome overheads. DASA will investigate providing training through existing courses to ensure AUO's understand the scalability of the AMC application.</i>
22	AMC UAS.35(a)3iii.a	Navy FAA	Airspace Management AMC Missing the word 'in' between 'UAS' and 'Restricted' in the first line.		<i>Corrected.</i>
23	UAS.40	Navy FAA	Sub para (a)4 Missing the word 'operate' at the start of the sentence.		<i>Drafting error amended.</i>



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24	UAS.40	Navy FAA	UAS 40 Sub para (a).5.iii To support increased usage by resource constrained units that are unlikely to be able to manage compliance with all parts of UAS 30.b and a SS, suggest a conditional expansion of scope of UAS.40 to support BVLOS and night flight, constrained to isolated or remote environments. Sub 2kg weight limit may suffice, though with emerging technology and capability requirements, 25kg would be most suitable. This could b targeted at COTS platforms that will likely continue to be most numerous in ADF. See embedded screen shot below of suggested paragraph addition to UAS.40 and some explanatory notes. Also see DCOMFAA email to DAVNOPS (27 Nov 25)	This would still present low risk overall due remote area operations but the vastly reduced organisational overheads would be more attractive to resource constrained units that still seek capability, such as patrol boats. Maintaining a 400' ceiling is still a robust risk control to compliment isolated or remote area ops. Additional risk controls would likely be implementable such as radio broadcasts, flight planning, observers (looking for crewed aircraft in the same airspace volume.	<i>Additional visual options and guidance provided in UAS.40 as per LSN 1.</i>
25	UAS.40	Navy FAA	Sub para (b).5.vi(a) and (b)Formatting is incorrect (requires indent)		<i>Drafting error amended.</i>
26	Various	AFHQ AISR	Recommend tighter consistency in terminology. 'UAS Operator', 'Authorised UAS Operator', 'UAS Organisation' and 'Authorised UAS Organisation.' If these are intended to be separate definitions, include in the glossary.	For example, GM UAS.30.a.(a)2.ii "Of note, MAO's are Authorised UAS Operators where the OpSpec details permission to operate the relevant category of UAS." Is this intended to mean the operating SQN subordinate to the MAO is an 'Authorised UAS Operator', or is it intended to mean the MAO is an 'Authorised UAS Organisation (AUO)'? (Glossary term)	<i>One remaining reference to UAS Operator purged from updated DASR UAS.</i>
27	Various	AFHQ AISR	Use of the phrases: 'Elevated Aviation Safety Risk' and 'Elevated Risk' Needs improved definition (elevated against what baseline?)	Non-certified UAS generally present an 'elevated safety risk' as compared to a certified-category UAS. Recommend DASA define what is meant by 'elevated' in this context.	<i>The use of the phrase 'elevated Aviation Safety Risks' is intentionally broad in scope to enable the Services and Groups to define contextualised Risk Management requirements and appropriate thresholds for elevation.</i>
28	GM UAS.10(c)ii	AFHQ AISR	DASR UAS non-applicability DASR Regulations do not apply to Defence UAS operating indoors where the Uncrewed Aircraft (UA) is physically contained within the indoor operating area; however the WHS Act still applies.This implies the risk of all operations indoors presents no aviation safety risk to people inside the building. Is the assumed context the UAS operator and other personnel are inside the building but outside the indoor contained area? If yes, why limit to 'indoors'?	Potential policy loophole.	<i>Indoors flights are a general WHS risk. There is no safety benefit to treating this risk through the DASRs, given that, of the two core aviation risks (air and ground):1) the potential for loss of Deconfliction with crewed aviation is eliminated2) unintended descent leading to death or injury is significantly mitigated through close proximity and exclusion of third parties (ie Flight profiles are constrained, and the operator has improved capability to exclude bystanders).Non-regulation of indoor UAS aligns with benchmarked CAA/MAA.</i>



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29	GM UAS.10(a)b and c	AFHQ AISR	Authorisation "The responsibility for ensuring the safe operation of UAS rests with Service Chiefs or Groups Heads, irrespective of whether DASA issues a discrete authorisation." Recommend change 'authorisation' to 'approval'	My understanding is only Command can Authorise UAS Operations – DASA Approves.	<i>DASPMAN Volume 3 Chapter 5.3.2 provides further detail on the use of the term 'authorisation' as a DASA process.</i>
30	AMC UAS.10(b)4	AFHQ AISR	Para .a – Management of OIP "UAS Organisations should ensure all OIP is:" Unbounded requirement. Recommend: "UAS Organisations should ensure OIP related to the UAS Operation is:"	'OIP' is unbounded. Also, DASR should be constrained to the Safety risk dimension. If the OIP isn't mitigating a safety risk, then it shouldn't be considered under DASR.UAS.	<i>This requirement resides within the context of the DASR UAS scope, and therefore is only relevant to Aviation Safety.</i>
31	AMC UAS.10(b)4	AFHQ AISR	Para c OIP issued under this regulation should include:iii. defined periodic review criteria not exceeding 12 months (Defence AIP will follow the 28 day Air Information Regulation and Control (AIRAC) cycle)."12 months appears excessive.	Eg recommend a review period that's consistent with the risk the OIP mitigates (and if the OIP isn't mitigating a safety risk, then it should not be considered under DASR.UAS). Eg if the risk is noteworthy, DASM continuous monitoring and review policy requirement is 12M, for non-noteworthy it's 24M.	<i>Refer to response for the same issue addressed in LSN 31.</i>
32	UAS.30.a	AFHQ AISR	Implementation of a Flying Management System (FMS) contextualised for the UAS CRE that: a. employs suitable risk controls to address the risk of Deconfliction breakdown, contextualised for the UAS CRE b. employs suitable risk controls to address the risk of unintended descent, contextualised for the UAS CRE	'suitable risk controls' should be more generic requirements, not just a component/subordinate of the FMS. Eg Design, Operational and Systemic risk mitigations can be applied outside/in addition to the FMS.	<i>These requirements are moved up one level, amended as per the suggestion.</i>
33	GM UAS.30.a(a)	AFHQ AISR	Also in various other sections throughout DASR.UAS: "This regulation identifies the accountable person for safe UAS operations." 'Safe' is too subjective recommend something like: This regulation identifies the accountable person for ensuring Aviation Safety risks to other airspace users, and to people and critical infrastructure on the ground or water is eliminated or otherwise minimised SFARP	DASR.UAS doesn't require 'safe operation' it requires risks be elim/minimised SFARP (which could mean 'elevated risk' to third parties when necessary)	<i>'Safe' removed, retaining the intent.</i>



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34	AMC and GM UAS.30.a(a)2.iii	AFHQ AISR	This section reads like an SMS is not mandatory. SMS should be more prominent because that's where the 7-Step safety risk management requirements are set.	Given this is a Specific Type A regulation, the assumption is the UAS doesn't meet certified category standards, so there is a level of inherent design risk.	<i>The draft wording allows for the scaling of SMS requirements appropriate to a UASOP application.</i> <i>In some cases, full compliance with DASR SMS may not be necessary, with requirements more akin to that provided in UAS.30.b.</i>
35	Nil	AFHQ AISR	Recommend DASA include obligations for 'Duty to consult.' In the case of Triton, DG DASA approved consultation with shared duty holders only, which is currently limited to 'Deconfliction' with Air Services and CASA. There is no defined 'Shared Duty Holder' for unintended descent risk.	To avoid the need to negotiate this point with DASA individually.	<i>DASA will consider elaboration of 'duty to consult' as it relates to UAS in Volume 3 material.</i>
36	GM UAS.30.a(a)2.v.b	AFHQ AISR	Risk controls for unintended descent (AUS) [DASA] refers to this as 'unintended descent', and is the point where control of the UA is lost and safety margins for people on the ground and Critical Infrastructure begin to diminish. An unintended descent scenario also includes controlled flight into terrain.	Inconsistent definition for unintended descent. Recommend expand to include controlled and uncontrolled situations. EG: 'Unintended descent' is an unavoidable loss of altitude which may include two cases: controlled descent (including CFIT) and uncontrolled descent (including catastrophic structural failure). This distinction matters for quantifying the risk: one where the RP is in control, the other where they aren't.	<i>The term 'unintended descent' is widely used and understood throughout the wider UAS community. Explicit definition likely does not serve the clarity of UAS.30.a</i>
37	GM UAS.30.a(a)2.v.c	AFHQ AISR	RP qualification and DASA authorised systems (AUS) e. When proposing to DASA a system to control a UA, the UAS Organisation should: iv. justify to DASA why the proposed system is sufficiently safe.	See LSN 33. 'Sufficiently Safe' is too subjective and inconsistent with DASR.UAS.10 (a) (requirement is to elim/min risk)	<i>Suggestion supported.</i>
38	Due Regard	AFHQ AISR	Requirements for Operations Due Regard is notably missing from DASR.UAS.30a Specific Type A (but included for others)	DASA should include Due Regard requirements for Specific Type A as the category of UAS most likely to need it.	<i>Wording added to GM UAS.30.a(a)2.v.a to point to the due regard prescription in UAS.30.b (standard scenario common requirements).</i>
39	UAS.35(c)	JDI	The current draft requirement for endorsement of operations by a TEAU is disproportionate to the standard scenario conditions.		<i>The TEAU requirement is removed and replaced with the requirement to have appropriate organisation, personnel and process in place for this standard scenario. These will be assessed by DASA on application to be an AUO where the AUO elects to use this standard scenario.</i>
40	Whole DASR UAS	ACG	Nil amendment required		



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41	UAS.35(c)	AWC	Summary email referred to separate discussions regarding: 1) Overburdensome requirement for TEAU endorsement under UAS.35(c) 2) Need to permit one to many operations within UAS.35(a) 3) Requirement that RP can intervene at all times is unrealistic for low-cost, long range UAS.		<i>DASA amended the UAS.35(c) TEAU requirement to instead implement a requirement for appropriate organisation, personnel and processes. This requirement (and AMC) triggers a DASA assurance (vice a TEAU) of those elements when a UAS Organisation or AUO applies to use UAS.35(c). As for the suggestions made regarding one-to-many operations and RP intervention; the additional permissions are candidates for UASOPs.</i>
42	UAS.35(a)	AWC	Two issues: One-many control is essential to exploit scaling opportunities of low cost long range UAS Expectation that operator can intervene at all stages is unrealistic for low cost long range UAS.		<i>The issues raised for autonomy and one-to-many operations are facilitated through the UASOP process.</i>
43	GM UAS.10	Name withheld	Paras b.i and ii: Given that DASR UAS does not apply to UAS operated by Defence as civil aircraft, presumably demonstration flying of UAS for Defence must then remain compliant with CASR 101 and therefore cannot allow defence personnel to perform RP roles unless they hold the appropriate civil RePL and are inducted into a contractor's ReOC for included operations?	We have had instances where defence personnel have insisted on operating civil drones being demonstrated.	<i>This comment points to the interface between DASR UAS and NDR, which is now well-defined. Any further issues will be solved through education.</i>
44	GM UAS.10	Name withheld	Paras b.i and ii Is it intended that the DASR UAS.10 enables the use of civil ReOC holders for NDR UAS operations in a similar way that Defence hires civil operators for Charter / Aerial work?		<i>DASR UAS refers to DASR NDR where Defence employs non-Defence registered aircraft.</i>
45	GM UAS.10	Name withheld	Para b.i and ii Is it intended that the DASR UAS.10 enables Defence operation of civilian registered UAS?		<i>DASR UAS does not enable operation of civilian registered UAS. This is the role of DASR NDR.</i>
46	GM UAS.30.a(a)2.ii	Name withheld	By what instrument is an organisation granted an "Authorised UAS Organisation" AUO?		<i>Authorisations for AUO's will be granted through a Approved UAS Operator Certificate (AUOC) and AUOC Operations Specification.</i>
47	DASR GM UAS.30.a(a)2.ii	Name withheld	What scopes, roles and permissions exist within an Authorised UAS Organisation? It appears to be UAS flying only, however there are regulations and implications in initial and continuing airworthiness as well.	By way of further explanation, in crewed aviation there are separate approvals for initial and continuing airworthiness from operations.	<i>Scopes, roles and permissions will be provided as part of the AUO authorisation process.</i>



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48	GM UAS.30.a(a)2.ii	Name withheld	Are Authorised UAS Organisations only defence organisations for UAS flying operations or may a ReOC holder apply for AUO?		<i>Yes, only Defence UAS Organisations.</i>
49	GM UAS.30.a(a)2.v.c	Name withheld	Para d. and e. What is the measure and evidence and pathway required for achieving a DASA Authorised System for controlling a UA iaw DASR UAS.30 (a) 2.v.c in the absence of control by a RP?	BAE Systems has developed a Vehicle Management System (VMS) for the autonomy implemented on a current defence platform, but given we are not the prime for that project, BAE Systems has been held apart from DASA. This area of the proposed regulation suggests a requirement for the autonomous system element to become authorised, but does not delve further into how to achieve that. Naturally, this element of the regulation is of significant interest.	<i>This will be determined when the Aviation Safety community propose a system for DASA to approve. This will be determined at the point of application.</i>
50	GM UAS.30.a(a)2.v.c	Name withheld	Para e Can only an AUO propose a System of Control of a UA to be DASA Authorised?	BAE Systems has developed a Vehicle Management System (VMS) for the autonomy implemented on a current defence platform, but given we are not the prime for that project, BAE Systems has been held apart from DASA. This area of the proposed regulation suggests a requirement for the autonomous system element to become authorised, but does not delve further into how to achieve that. Naturally, this element of the regulation is of significant interest.	<i>A 'system of control' proposal is not restricted to AUOs.</i>
51	GM UAS.30.a(a)2.v.c	Name withheld	Para e As a developer and provider of a system of control in lieu of a RP, is there a means of achieving a DASA authorisation of this System independent of the operator. It appears that achieving a DASA authorised system is a pre-requisite to the DASA issue of a UASOP to an AUO.	BAE Systems has developed a Vehicle Management System (VMS) for the autonomy implemented on a current defence platform, but given we are not the prime for that project, BAE Systems has been held apart from DASA. This area of the proposed regulation suggests a requirement for the autonomous system element to become authorised, but does not delve further into how to achieve that. Naturally, this element of the regulation is of significant interest.	<i>DASA will field commercial queries separately to the NPA CRD process.</i>



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52	UAS.30	Name withheld	Given that the CASRs prescribe the JARUS SORA methodology for more complex included operations, will equivalent DASR operations for a previously approved CASR vehicle / operation consider an existing approved SORA as an acceptable means of compliance underpinning a DAS approval?	Prior to defence sponsorship, R&D flight operations of medium and large RPAS intended for defence are entirely within the civil regulatory framework and require civil approvals iaw CASR101. By enabling mutual recognition of existing approvals, minimum viable demonstrators and concepts will be quicker and cheaper to transition to ADF units / defence customers / sponsors and AUO.	<i>Applications are assessed on a case-by-case basis to ensure appropriateness for the Defence operating and Aviation Safety environment.</i>
53	Whole DASR UAS	AFHQ Combat Futures	Various editorial - see marked up copy in the link		<i>All editorial suggestions incorporated.</i>
54	Definitions	SRG	Include specific statement that a MAO whose OpSpec allows for UAS operations is an Authorised UAS operator.	This statement is contained within UAS.30.b but should be included in UAS.10.	<i>Updated definition provided as a new term in the DASP Glossary and Acronyms.</i>
55	GM UAS.10	SRG	Para b.iii It is not clear why the ESRF is specifically cited within the GM, as opposed to included within GM sub-para e.	Why is ESRF specifically cited here and not in e. See also comment in LSN 58.	<i>The ESRF applicability guidance is moved to both GM UAS.10, paragraph e, and GM UAS.10(c)2, paragraph b.i.</i>
56	GM UAS.10	SRG	Para els this list intended to be exhaustive? If not, I would question the relevance of inclusion.		<i>The list is provided in DASR UAS for policy and regulatory context, where DASR UAS users may not be familiar with those broader contexts and have an interaction with Aviation Safety.</i>
57	AMC UAS.10(b)4	SRG	Is this AMC not just covered by AO.GEN.05?	Unsure why a current regulation (AO.GEN.05) has been re-written and included separately under the UAS section.	<i>The OIP management AMC is tailored for the UAS context. Additionally, the DASR UAS is designed as a largely self-contained DASR for ease of interpretation by the UAS community</i>
58	GM UAS.10(c)2	SRG	Para c It is not clear why the point regarding weaponised UAS is specifically highlighted.	Inclusion of this component of GM appears to be in direct contrast to the specific reference to the ESRF in earlier GM (see LSN 55). Suggest that only one of these sections is required.	<i>Minor amendments made for clarity.</i>
59	GM UAS.10(c)2i	SRG	Para a.iv. It is not clear whether this refers to targeting applications contained within the UAS system boundary or more broadly.	Attempting to regulate this under DASR.UAS is setting a potentially unworkable precedent, particularly if it is intended to consider applications outside the UAS system boundary.	<i>Replaced '...of the targeting applications...' with '...of the weapon system...'.</i>
60	GM UAS.10(c)2i	SRG	Para a.vi. GM states that normal Defence procedures for laser safety clearance apply.	If this is IAW normal defence procedures for laser safety clearances, then why does it need to be included?	<i>DASR UAS is applied by a broad spectrum of the Defence community. Guidance such as this assists the community in applying the regulation in context to other regulations and policies.</i>



DASR UAS Comment Response Document to NPA for DCP 003-2024

LSN	Updated DASR Reference	Unit or Organisation	Comment or suggested change	Further Explanation where provided	DASA response
61	GM UAS.30.a(a)	SRG	Para e Will DASA re-issue existing UASOP in a compliant format?	The DASA-issued Triton UASOP does not follow this minimum requirement.	<i>DASA will only re-issue UASOPs where there is a clear benefit to Aviation Safety.</i>
62	AMC UAS.30.a(a)2.i	SRG	Para c Is there a definition of what constitutes an administrative change that does not require DASA endorsement?		<i>DASA has intentionally left these definitions to the UAS Organisations to define, contextualised to their own CRE and organisation. Previous experience demonstrates that implementing a Defence-wide definition leads to unintended regulatory effect.</i>
63	AMC UAS.30.a(a)2.ii	SRG	Para a.i. This is the first mention of Authorised UAS operator within the regulation.	More detail on Authorised UAS Operator is documented in DASR.UAS.30.b. Recommend inclusion of a cross-reference to this or repeating the same matter in UAS.30.a. (for convenience).	<i>Approved UAS Organisations are mentioned in GM UAS.10(b).</i>
64	AMC UAS.30.a(a)2.iii	SRG	Suggest inclusion of: "operation of a Spec Type A UAS under an existing MAO SMS" is an AMC for this requirement.		<i>A suitable MAO SMS would comply with the existing AMC, but this is not automatic.</i>
65	AMC UAS.30.a(a)2.v	SRG	Suggest inclusion of: "operation of a Spec Type A UAS under an existing MAO FMS" is an AMC for this requirement.		<i>AMC does not prohibit a MAO SMS from meeting compliance. However, a MAO still needs to ensure that their SMS is suitable for the context.</i>
66	GM UAS.30.a(a)2.v.a	SRG	Para e Acknowledge the cross reference to UAS.30.b, but suggest - given UAS.30.a applies to larger, more complex UAS, that airspace integration aspects be given greater prominence than a cross-reference.	Given the intent that DASR.UAS is a stand-alone regulation, the hierarchy should be to read from higher (Spec Type A) to lower categories.	<i>The updated Specific category system treats Specific category Type A and Type B as parallel categories (not one above the other). The rationale is to quantify all the 'known' standardised risk controls and place those in the relevant Type B UAS.36 and UAS.35 standard scenario, which then provides the opportunity for Type A applicants to leverage those known risk controls as far as possible. Therefore, rather than replicate material across Type A and B, DASA has placed 'known' risk controls in Type B and referenced those in Type A to provide applicants a basis for leveraging extant material for a Type A application.</i>
67	GM UAS.30.b(a)1i	SRG	Para b Definition of a MAO as an Authorised UAS organisation should be included within the GM for UAS.30.a.	See also LSNs 1 and 10 (in submitted feedback sheet)	<i>Approved UAS Organisations are mentioned in GM UAS.10(b).</i>



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LSN	Updated DASR Reference	Unit or Organisation	Comment or suggested change	Further Explanation where provided	DASA response
68	AMC1 UAS.30.b(a)3vi.a	SRG	The regulation covering due regard is equally, if not more, applicable to UAS.30.a. and should be included within that regulation.a. ii. detailing the type of coordination and de-confliction in use to ensure the UA does not pose a hazard to other Aircraft (eg segregation, a Manual of Air Traffic Standards (MATS) Separation standard for application <u>approved and applied</u> by Air Traffic Control if applicable, and any local De-confliction with Participating Aircraft).Likewise recommend para b (Consultation) be amended to include:b. iii. <u>consult the agency responsible for the provision of Air Traffic Control services within the airspace (if applicable).</u>	An organisation seeking to operate a Spec Type A UAS under a UASOP should not need to dig into UAS.30.b. for details of AMC for integration with other aircraft.We feel the wording of para (a)(ii) does not adequately convey that it is the authority responsible for the provision of Air Traffic Control services (Defence or Airservices Australia) who must determine whether or not a proposed deconfliction method satisfies the Manual of Air Traffic Standards.	See LSN 66 response. Additionally, paragraph a.ii is amended per the suggestion. The suggestion for paragraph b.iii is covered through GM UAS.30.b(a)3vi.a, paragraph g, which points to ERSA and DAH for the applicable Airspace authorities.
69	GM UAS.30.b(a)3vi.a	SRG	Query: Is this implicit that DASA believe UAS operated IAW this part of the Regulations are capable of operating with due regard? Recommend rewording of para (h)(ii) as follows, consistent with the advice in LSN 15 (in submitted feedback): ii. provide documentation to inform (eg via the DASA ATMP template) relevant external stakeholders of the Aviation Safety hazards, relevant limitations and Risk Management associated with planned UAS operations, including: (a) UAS description, including equipage and navigational capabilities (eg GPS and altimeter accuracy, size of UA, operating ceiling, relevant launch/recover and manoeuvring capabilities) (b) type or volume of Airspace for intended operations (c) segregation or separation methods (eg RA, MOAs, MATS-compliant methods <u>approved by the responsible Air Traffic Control agency</u>) (d) limitations (eg RP operating limits, lack of see and avoid capability, non-certified equipage, communications transceiver range limits, any prohibition of Flight above other Aircraft) (e) a formal operations liaison POC (eg Operations Officer).		If UAS Organisations are compliant with the UAS.30.b due regard requirement and AMC, then their operations satisfy the due regard obligations. The suggestion provided is incorporated in paragraph (c).



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LSN	Updated DASR Reference	Unit or Organisation	Comment or suggested change	Further Explanation where provided	DASA response
70	UAS.36	AFTG	The revised UAS.35 provides Standard Scenarios for 4 classes of operations:(a) operations over non – Defence Controlled Land or Water(b) one RP to many UAs(d) Test and Evaluation (T&E)(e) Weaponised UAS evaluationand the new UAS.36 provides:(a) limited operations over non – Defence Controlled Ground or Water(b) over Defence Controlled Ground or Waternone of which accommodate the Defence Explosive Ordnance Training School (DEOTS) UAS RP training locations.	DEOTS operates over Defence controlled land not within a restricted area or military operating area for training UAS RP that involves EVLOS, and may involve BVLOS (inside a container, or behind a barrier), hence is not within the scope of UAS.40. None of the Standard Scenarios match the DEOTS Environment. Likely inadvertent and solved by adding guidance to both UAS.35(a) and UAS.36(a) that operations over non – Defence Controlled Land or Water also permits use of the scenario over Defence Controlled Land or Water.	<i>Guidance Material added to the first requirements for UAS.36(a) and UAS.35(a) stating the permission to use standard scenarios for use over Defence Controlled Ground or Water.</i>
71	UAS.36	AFTG	The revisions in UAS.35 that reflect the European Specific Operations Risk Assessment (SORA) 2.0 UAS characteristic dimension criteria (UA Dimension in the DASR UAS DCP 2023-003 draft) is noted. That is relating to the Ground Risk Classification via the UA Dimension, and DASA has selected three standards: 1 m, 3 m and 8 m UA Dimension; and three speeds 25, 35 and 75 metres per second, and matching the UA Dimension and speed 1–25, 3–35, and 8–75 in UAS.35 Standard Scenarios. However, UAS.35 leaps from 1 m, 25 metres per second not requiring operating within an RA or a MOA (airspace that can exclude non – Participating Aircraft) to 8 m, 75 metres per second requiring operating within an RA or a MOA. This completely side-steps the SORA 2.0 (and continuing in SORA 2.5) Airspace Risk Category (ARC) decision tree. A UA operating at low level, such as below 120 m (400 ft), and certainly a UA operating below 45 m (150 ft) and lower again below 30 m (100 ft), is operating in 'atypical airspace' as defined in the SORA 2.5 and these levels comprise an ARC a, even without considering whether the UA is operating VLOS, EVLOS or BVLOS, and at regardless speed. [Note the 30 m and 45 m values correspond with the elevations of structures requiring reporting vide CASA AC 139.E-01.] ARC a does not require airspace risk controls in the SORA.	AFTG operations of UA within the Air Force Drone Racing Association CRE are approximately 0.3 m UA Dimension, up to 35 metres per second realised velocity, and maximum commanded 75 metres per second possible, and approximately 3 minutes duration at the 35 metres per second maximum realised and the average speed is much, much less (so too is the velocity), and the duration is much, much less than 3 minutes if the UA were flown at the maximum commanded possible (seconds, not minutes). Thus the area of risk is very much smaller than that set by UAS.35. Yet the role does not fit under UAS.35 or UAS.36 for the UA Dimension and speed performance. The use of FPV with spotter does not sit within UAS.40 (note that UAS.40 does not have speed, area and airspace constraints prescribed under UAS.30(b) in alignment with CASA Excluded category). The UA Dimension and 75 metres per second performance derives a SORA 2.5 1.46 m iGRC and operating always below 120 m (400 ft), rarely above 45 m (150 ft) at the apex of manoeuvres, and well below 30 m (100 ft) when at the maximum speeds, is SORA 2.5 ARC a, placing the AFTG Sponsored AFDRA CRE well inside of the SORA risk parameters, yet outside the implementation in the proposed DASR UAS DCP 2023-003 Standard Scenarios. The DASR 31 Jul 25 UAS.35 scope for up to 2 kg UAS over non-Defence areas, and more than 2 kg and up to 25 kg over Defence areas, needs to be rethought for incorporating in to the DCP 2023-003 revision.	<i>An additional option is provided under UAS.36(b) to permit UAS to operate below 400ft AGL outside RA over territorial land or water. Additionally, UAS.40 now provides expanded visual range options, which enables the operations identified in the feedback.</i>
72	UAS.40	AFTG	Use of maximum take-off mass as a defining parameter when actual flight mass is the hazard.		<i>Take-off-weight added to the relevant UAS.40 sections.</i>
73	Whole DASR UAS	AFTG	Numerous administrative/editorial comments.	See additional detail in link.	<i>Various editorial amendments made.</i>



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LSN	Updated DASR Reference	Unit or Organisation	Comment or suggested change	Further Explanation where provided	DASA response
74	Whole DASR UAS	AFTG	Numerous definition and glossary comments	See additional detail in link.	<i>Various editorial amendments made.</i>
75	UAS.10(b)3	CASG UASPO	"provide to DASA upon request, all data and access to support initial and ongoing compliance assurance of UAS operations." The requirement to provide "all data and access" is broad. It is not clear what this may require, creating difficulties in contracting and compliance challenges. There is no detail on the timeline that this access to data and access needs to be provided to DASA. Suggested improvement: Specify what type of data is required (for example: UAS safety case, operational logs, maintenance records, configuration data). DASA to provide a reasonable notice period.		<i>The requirement is intentionally broad, although bound to the Aviation Safety scope of assurance. DASA works with the community to establish reasonable timeframes through a deliberate and routine Oversight and Enforcement (O&E) schedule and other ad hoc activities as required. DASA will always endeavour to provide reasonable notice and assistance to the community in the execution of O&E.</i> <i>If the UAS Organisation is relying on data held by an OEM to demonstrate compliance, it is reasonable to expect the UAS Organisation liaises with the OEM to seek that information and provide it to DASA. DASA would not seek that information directly from an OEM.</i>
76	UAS.10(b)2ii	CASG UASPO	AMC and GMIt could be difficult for UAS Organisations to develop a local register for UAS, particularly for the intent of traceability between a UA and operating unit. A local register may not be able to maintain accurate traceability when components and systems are constantly distributed. The cause of this issue is twofold. 1. Serial numbering is complex for a UAS platform that is subject to significant cannibalisation of UAS components. Defining the serial number for a platform is via identifying a key component, such as a centre wing or avionics module. More vulnerable components of the system are replaced when damaged. 2. For an in-service SUAS platforms (eg. Puma/Vector/Skylark) logistics management is centralised (eg. UASPO). Systems are moved around and between a number of logistics units, operating units, and in-country support organisations. The key components are tracked via ERP (and previously via MILIS). Suggested improvement: Key components are already tracked via ERP systems (and historically MILIS), which provide better traceability than a static local register. AMC UAS.10(b)2ii "...centralised local register or ERP system tracking"		<i>UAS Organisations and supporting agencies could implement systems such as ERP as the means of compliance to the AMC on the condition that they meet the intent.</i>



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LSN	Updated DASR Reference	Unit or Organisation	Comment or suggested change	Further Explanation where provided	DASA response
77	AMC UAS10(b)4	CASG UASPO	Para d.iii The AMC makes use of the acronym AIP. I suggest that this be expanded to Aeronautical Information Package.		<i>Acronym expanded and amended to Aeronautical Information IAW the DASP Glossary.</i>
78	GM UAS.10(c)1	CASG UASPO	Recommend that experimentation should be treated as ongoing until safety is assured rather than post first flight, with additional requirement for mandatory mishap data collection and safety investigations		<i>Although these examples are not exhaustive and provided only for guidance, slight amendments are made to clarify intent.</i>
79	GM UAS.10(c)1	CASG UASPO	There needs to be guidance material of the threshold as to when a UAS Organisation requires the support of a T&E Accountable Unit (TEAU).		<i>Further consultation with the commenter identified that amendments made across other LSNs for UAS.10 and UAS.35(c) provide the necessary clarity.</i>
80	GM UAS.10(c)1	CASG UASPO	Para b Suggested Improvement: UAS Experimentation Flights are conducted as Defence Test & Evaluation (T&E) activities to inform capability development. They shall be planned, resourced, conducted and reported via a Test Plan, consistent with DTEM v3 Ch 4. Where experimentation can be performed without exposing MEP, Informed Personnel or the General Public (GP) to risks beyond normal operations, it may proceed under the approved Test Plan. Where additional safety risks exist, the UAS Organisation shall implement risk controls SFARP, verified at Test Readiness Review and evidenced in Test Reports, with artefacts recorded in the enterprise system. Activities shall be conducted by competent T&E personnel and, where industry performs testing, Defence oversight shall be applied proportional to risk. If experimentation spans Domains or requires enterprise adjudication, the Defence Trial process and TECSG/VCDF directives apply.		<i>The suggested prescriptive material resides within the boundary of the DTEM scope and subordinate Service and Group policies. Any attempt to refer to specific elements of the DTEM risks de-coupling the DASR UAS and DTEM where amendments are made to the DTEM.</i>
81	GM UAS.10(c)2.i	CASG UASPO	Suggest making reference to non-DASR requirements for safety and risk management associated with weapons integration.		<i>A non-exhaustive list of non-DASR requirements is already provided in GM UAS.10.</i>



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LSN	Updated DASR Reference	Unit or Organisation	Comment or suggested change	Further Explanation where provided	DASA response
82	UAS.30.a	CASG UASPO	The UAS Organisation, SMS, and FMS requirements outlined in reg. GM & AMC for UAS.30.a appear to be less clearly defined compared to those in GM & AMC UAS.30.b. It is recommended that UAS.30.a be enhanced by aligning with the requirements specified in UAS.30.b, as well as any additional requirements directed by DASA.	It is reasoned that this would simplify and minimise the regulations.	<i>This is intended to permit organisation flexibility when applying for a UASOP.</i>
83	GM UAS.30.a(a).d.i	CASG UASPO	Suggested improvement: Replace "... construction..." with "...production...", as it is more aligned with aviation airworthiness terminology.		<i>Amended per the suggestion.</i>
84	GM UAS.30.a(a)	CASG UASPO	Para .e.xii Suggested improvement: Identify Aviation Safety Events and Aviation Safety Issues that must be reported.		<i>Although the suggestion to report Aviation Safety Events is covered by UAS.10, it is added here for explicit clarity.</i>
85	GM UAS.30.a(a)2.ii	CASG UASPO	Suggested improvement: Change the section title to Authorised UAS Organisation requirements.Suggested improvement 2: UAS Organisation requirements should include the implementation of the Aviation Safety Management System.		<i>SMS is called out explicitly to highlight the importance of a SMS to non-traditional aviation organisations.</i>



86	UAS.30.a(a)2.iii	CASG UASPO	Current text: implementation of a Safety Management System (SMS) contextualised for the UAS CRE, as directed by DASA. Suggested improvement: implementation of a UAS Safety Case contextualised for the UAS CRE. The DASA definition of SMS (and by extension ASMS): <i>A systematic approach to managing aviation safety, including the necessary organisational structures, accountabilities, policies and procedures.</i> The SMS is a management plan, and therefore should be an assessment of the UAS Organisation. The current regulation reads that the actual Safety Case of the platform is not a consideration for a UASOP application, and subsequent operations. It is reasoned that a UAS platform Safety Case, inclusive of AC 01/2018 for risks to other airspace users, people and CI should be the key document in order to permit operations. It is argued that UAS Safety Case should have a aviation safety section regarding the three AC 01/2018 risks, and required for UAS.30.a(a)2.v.a and UAS.30.a(a)2.v.b as part of the FMS. Consideration for additional guidance materiel for UAS.30.a(a)2.iii (acknowledge that this is outside of aviation safety scope). Alternatively the suggestion below could be well placed in GM UAS.10.e.i.a, sub-ordinate to the WHS section: A Safety Case should contain a non-aviation safety section detailing WHS hazards and risk controls. Prior to UAS operations, the UAS Organisation is required to provide assurance that the risks to health and safety arising from materiel it acquires and sustains on behalf of Defence are eliminated/minimised so far as is reasonably practicable for all reasonably foreseeable activities across the life cycle. A safety case is defined as a structured argument, supported by a body of evidence, that provides a compelling, comprehensive and valid case that, for a given application in a given environment, safety hazards and risks associated with the material system have been treated SFARP, for all reasonably foreseeable activities across the system's life cycle. The UAS Organisation supplying UAS equipment has the following key WHS responsibilities: • The UAS Organisation who is supplies of UAS equipment that is to be used, or could reasonably		<i>The requirement is for the UAS organisation to implement a system of management (SMS), not a specific artefact. (Plan or Safety Case).</i>
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LSN	Updated DASR Reference	Unit or Organisation	Comment or suggested change	Further Explanation where provided	DASA response
			be expected to be used, at a workplace must ensure all workplace activity relating to it including its handling, storage and disposal or dismantling is, so far as is reasonably practicable, without risks to health or safety when used for its intended purpose. • The UAS Organisation must carry out or arrange tests and examinations sufficient to ensure that the supplied UAS equipment meets work health and safety requirements when used for its intended purpose. Alternatively the UAS Operator must ensure that these tests and examinations have been carried out. • Adequate information must be given to any person who the UAS Organisation supplies with the UAS equipment about its intended purpose, test results and any conditions necessary to ensure that when used for its intended purpose it is safe and without risks to health or safety. Current relevant information must also be provided, so far as reasonably practicable, to other end users at a workplace upon request.		
87	GM UAS.30.a(a)2.iv	CASG UASPO	Suggested Improvement: Refer to the DASA Factsheet for Initial and Continuing Airworthiness, or provide general concept of what Initial and Continuing airworthiness is for the UAS Organisations. GM UAS.30.a.(a).iv provides guidance that UAS Organisations should, if required, provide in their UASOP application evidence of their initial and continuing airworthiness systems. It is reasoned that this GM should provide UAS Organisations an understanding of what this evidence could include in order to address the I&CAw concept.		<i>No additional material is provided in this section, given that DASA plans to publish Volume 3 and other explanatory material in the following the publication of DASR UAS.</i>
88	GM UAS.30.b(a)1i	CASG UASPO	Suggested improvement: IA and CA for UAS are not defined acronyms		<i>IA and CA are both in common DASA usage. Internal process to be actioned to place CA on the acronym list.</i>



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LSN	Updated DASR Reference	Unit or Organisation	Comment or suggested change	Further Explanation where provided	DASA response
89	GM UAS.30.b(a)2	CASG UASPO	"The design system safety and reliability requirements drawn from initial and continuing airworthiness principles". This citation is within the GM section, and it is reasoned it should provide more guidance than referring to principles that could be further defined for a UAS context. The DASP 7.1.2.1 Initial and Continued Airworthiness perspective could be modified for the UAS context, to provide further clarity. It is also confusing to refer to continuing airworthiness in the guidance material for initial airworthiness. The definition of continuing airworthiness makes reference to maintaining the UAS in a safe condition for safe operation IAW with the intended CRE. It is reasoned that the term "intended CRE" in most cases is an Initial/Continued airworthiness assessment.		<i>The reference in paragraph a. to 'continuing' is amended to 'continued', and 'IAW the intended CRE' is deleted. DASA's intention is to convert the guidance in the INCA factsheet to Volume 3 material.</i>
90	AMC UAS.30.b(a)2ii	CASG UASPO	The current AMC text, " <i>The UAS Organisation should establish a system to collect, investigate and analyse information on in-service failures, malfunctions and defects to detect and have rectified unsafe conditions and to inform safety risk management review.</i> " does not relate to or support the subject regulation. The text relates to having a system to monitor and rectify defects. Suggested Improvement: The UAS Organisation is to establish a system to approve design changes, cognisant of the extant UAS CRE. The system is also to assess the comparability of the extant UAS design to proposed changes to the UAS role and operating environment. The system is to identify where design changes may affect the validity of the extant UASOP, and seek DASA advice whether an updated UASOP is required. Changes to the design shall be recorded in a configuration status account.		<i>Wording amended to incorporate the suggested intent.</i>
91	GM UAS.30.b(a)2i	CASG UASPO	Rather than provide a list of five examples to include, make reference to DASDRM Section 4 Chapter 3, for a list of standards and guidance material to inform staff with the technical risk assessment, or make reference to AC 01/2018.		<i>This is not intended as an exhaustive list, rather the most relevant examples. Future published material will expand more fully on this topic.</i>
92	AMC UAS.30.b(a)2iii	CASG UASPO	The UAS Organisation should put in place a system to ensure that maintenance and operating instructions are available to end users in the latest amendment.		<i>Suggestion intent incorporated in amendments to paragraph a.i.</i>



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LSN	Updated DASR Reference	Unit or Organisation	Comment or suggested change	Further Explanation where provided	DASA response
93	AMC UAS.30.b(a)3ii.a	CASG UASPO	Is the acceptable means of compliance for Authorised UAS Organisations IAW DASR SMS, to have an occurrence reporting framework?		<i>Partial move of this AMC to GM UAS.10(b)1 and the remainder deleted due to duplication of requirements across other sections.</i>
94	GM UAS.30.b(a)3iii	CASG UASPO	Para .a.ii Suggested Improvement: "with any existing authority delegations and limitations"		<i>Resolved through direct liaison.</i>
95	UAS.30.b(a)3vi	CASG UASPO	Suggested improvement: There could be a note in the AMC for UAS Organisations to adhere to the security requirements associated with correctly classifying, and marking documentation that contain operating standards and limitations.		<i>Security requirements reside outside the Aviation Safety remit.</i>
96	UAS.35(a)1	CASG UASPO	Suggest defining UAS Safety Critical Systems		<i>Given that Safety Critical is already defined in the DASP Glossary, and that the intent is to provide flexibility to Services and Defence Groups to contextualise to their operations, there is no overall benefit to providing an additional definition.</i>
97	AMC UAS.35(a)2ii	CASG UASPO	See comment above for AMC UAS.30.b(a)2ii, particularly the suggested improvement. Text referred to: <i>'The current AMC text, "The UAS Organisation should establish a system to collect, investigate and analyse information on in-service failures, malfunctions and defects to detect and have rectified unsafe conditions and to inform safety risk management review." does not relate to or support the subject regulation. The text relates to having a system to monitor and rectify defects.</i> Suggested Improvement: <i>The UAS Organisation is to establish a system to approve design changes, cognisant of the extant UAS CRE. The system is also to assess the comparability of the extant UAS design to proposed changes to the UAS role and operating environment. The system is to identify where design changes may affect the validity of the extant UASOP, and seek DASA advice whether an updated UASOP is required. Changes to the design shall be recorded in a configuration status account.</i>		<i>DASA amended the parallel AMC in UAS.30.b(a)2ii to reflect the intent of the suggestion and deleted AMC UAS.35(a)2ii given that the updates resulted in duplication.</i>
98	AMC UAS.35(a)2iii	CASG UASPO	Maintenance requirements should specifically define UAS Operators' management of software updates, and recording the software updates against each tracked air vehicle component and GCS component.		<i>The suggested level of prescription is beyond the scope of this AMC, although UAS Organisations would need to develop that detail in order to comply with the AMC.</i>



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LSN	Updated DASR Reference	Unit or Organisation	Comment or suggested change	Further Explanation where provided	DASA response
99	UAS.35(b)2	CASG UASPO	Suggest a GM referring to another section on IA and CA for generic risk controls. There may be additional initial risk controls for a "one-to-many" standard scenario, particularly in HMI design features, autonomous system integrity, health monitoring systems, or datalink management (and functional and safe emergency procedures for loss of link). The "one-to-many" may require more consideration for configuration management with multiple air vehicles to the GCS.		<i>DASA added Guidance Material to prompt UAS Organisations to contextualise IA and CA risk controls specific for one-to-many operations.</i>
100	UAS.35(b)2	CASG UASPO	Is "one-to-many" permitted in a MUM-T scenario?		<i>Participating Aircraft are permitted under this standard scenario, which includes the conduct of 'teaming'. See the definition of Participating Aircraft in the updated definitions list.</i>



101	AMC UAS.35(d)	CASG UASPO	Suggested Weaponised UAS Risk Controls based on US DoD Uxs Precepts: 1. Weapon Safety and Control - Prevent unintended weapon release or firing: Design systems to isolate power and control circuits until explicit intent to fire is confirmed (DSP-4). - Require dual independent validated commands for arming and firing: Ensure proper sequence and verification of arm/fire commands (DSP-4, DSP-10). - Prevent firing into own structure (stores clearance) or friendly assets: Implement no-fire zones and dynamic cut-out areas (DSP-5). - Restrict autonomy in target engagement: Autonomy should only select and engage targets predefined by an authorized human (DSP-14). - Human consent for weapon release: Weapons should only fire with human approval or preconfigured criteria verified by the operator (OSP-8). 2. Target Discrimination and Engagement - Prevent engagement of unintended targets: Incorporate design features and operator validation steps to avoid friendly fire or collateral damage (DSP-6). - Validate target selection prior to engagement: Ensure compliance with Rules of Engagement (ROE) and operator oversight (DSP-6, DSP-14). 3. System State and Mode Management - Safe initialization and transitions: UAS must start in a safe state and prevent hazardous mode combinations (DSP-7). - Abort capability: Include an abort function that transitions the system to a safe state immediately (DSP-8). - Preconfigured safe states for failures: System should revert to a safe state upon safety-significant failure or loss of link (DSP-11). 4. Software and Autonomy Controls - Partition safety-critical software: Physically and functionally isolate safety-significant software from non-safety functions (DSP-9). - Validate learned behaviours before use: Newly learned AI behaviours must not affect safety functions until verified (DSP-13). - Disable learning mode during missions: Operator must be able to disable machine learning to prevent unpredictable behaviour (OSP-11). - Deterministic checkpoints: Implement runtime assurance and verification for autonomous decisions (Section 2.2.1). 5. Human-Machine Interface and Override - Manual override and mission abort: Operator must have the ability to take control and terminate missions (OSP-9, OSP-10, DSP-15). - Standardized controls for critical functions: Use common user interface elements for override, abort, and learning mode (DSP-15). - Operator awareness of autonomy: Ensure clear indication when autonomous behaviours are active (OSP-6). 6. Communication and Cybersecurity - Secure command	<i>The suggested inclusions are valuable material. However, inclusion of the proposed information risks blurring the separate responsibilities defined for Aviation Safety and for Explosive Ordnance etc. DASA refers to other policies and regulations in GM UAS.10 to provide those prompts to the Aviation Safety community.</i>
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LSN	Updated DASR Reference	Unit or Organisation	Comment or suggested change	Further Explanation where provided	DASA response
			and control links: Maintain integrity and encryption to prevent unauthorized control (PSP-8, DSP-3). Fail-safe on link loss: Transition to safe state or predefined recovery mode if communication is lost (DSP-11).		
102	Whole DASR UAS	Name withheld	Change "cannot be eliminated, and are minimised SFARP" To "cannot be eliminated SFARP, and are minimised SFARP".	Adding the SFARP after "eliminated" ensured clarity that SFARP is applicable to both the elimination and the minimisation. Consistency with the usage in the Australian WHS Act.	<i>Identified instances amended to align with the Act.</i>
103	AMC UAS.30.b(a)2i	Name withheld	Add to a. Safety and reliability: "Where it is not reasonably practicable, the UAS Organisation remains responsible for the safety and reliability of the UAS and should implement mitigations or alternatives that address the unsafe design conditions identified."	The use of Commercial Off The Shelf (COTS) products may not have the support traditionally associated with aeronautical products. This needs to be recognised but does not remove the safety requirement.	<i>Guidance Material added to this section to prompt consideration of Risk Management for remaining unsafe design conditions.</i>
104	GM UAS.30.b(a)2i	Name withheld	update a.i. To "appropriate and agreed (with relevant authority or agency) automatic Flight actions upon Command and Control Lost Link..."	Operations in controlled airspace will require ATC agreement on action/procedure to undertake on the loss of the C2 Link, and actions on recovery of the C2 Link.	<i>Suggestion intent added to GM UAS.30.b(a)2i.</i>
105	GM UAS.30.b(a)3vi	Name withheld	d.v. update to "Lose of C2 Link procedures that ensure safe routing and altitudes, complaint with specific standard scenario requirements and agreed to by the relevant authority or agency."	Operations in controlled airspace will require ATC agreement on action/procedure to undertake on the loss of the C2 Link, and actions on recovery of the C2 Link.	<i>Suggestion intent added to GM UAS.30.b(a)3vi.</i>
106	GM UAS.30.b(a)3vi.a	Name withheld	Update to be consistent with "due regard" references later in the document (GM UAS.35(b)3i).	"Due regard" is a Chicago Convention Article 3 obligation, stronger than a Defence term.	<i>Various references for 'due regard' amended for alignment.</i>
107	GM UAS.10	HQ AVNCOMD	Para b.i 'Karman line' Add 'Karman line' definition to Glossary (<100km AMSL)	Not a common term for non-Aviators	<i>'Karman line' is a term used in global convention, although no authoritative definition exists. In that context, it is not beneficial for DASA to define the term internally.</i>
108	AMC UAS.10(b)2ii	HQ AVNCOMD	UAS registration "Service and Groups should use a centralised local register". Include option for local registers (not only centralised).	Army current way of business is local registers at the Unit level; this change is significant and will require development of an appropriate and accessible register for all of Army to use. Additional to resourcing, the security implications of centralising a UAS register should be considered; congregation of data can elevate it above PROTECTED and create additional staff functions to manage it appropriately.	<i>'Centralised' is now removed from the AMC, and further guidance added to the GM to elaborate on the purpose of registration.</i>



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LSN	Updated DASR Reference	Unit or Organisation	Comment or suggested change	Further Explanation where provided	DASA response
109	GM UAS.10(c)2	HQ AVNCOMD	Weaponised UAS are when explosives are included/attached for purpose of applying destructive effect and GM states DASA will assess on case-by-case basis but what about Explosives carried for logistics (and other DG). When EO is not prepared for use how does the DASR view this UAS use and are additional controls required (outside of T&E for first time use to test load carriage interface)?	Consider expanding GM/AMC to include DG carriage or include section with applicable controls. Additionally, what other OIP covers UAS carrying DG (IATA)	<i>Reference to Dangerous Goods (DG) added to GM UAS.10, paragraph e, to prompt DASR UAS users to consider any additional hazards posed through the carriage of DG.</i>
110	UAS.10(c).2.ii	HQ AVNCOMD	Incorrect reference; change to UAS.35(d)		<i>Corrected.</i>
111	Whole DASR UAS	HQ AVNCOMD	The requirements in AMC across all UAS IRT CRE statement, IA/CA, training etc is standard across all UAS and is to be contextualised to the CRE and the organisation but is subject to interpretation and staff turnover in the regulator and regulated organisation. eg COTS <2kg UAS may be over regulated when corporate knowledge is low.		<i>DASA will investigate adding further guidance to Volume 3.</i>
112	AMC1 UAS.30.b(a)3vi.a	HQ AVNCOMD	Para b.i(f) - Airspace Integration AMC para states 'coastal regions above 100ft AGL out to 2nm from the coastline' - why? Who is the intended authority to be consulted in this circumstance?	Suggest change of text to align with the civil recreational standard (400ft AGL) unless the specific area/authority is detailed	<i>The intended regulatory effect for 100ft AGL was to ensure that UAS Organisations consider low flying aircraft in addition to those operating at normal altitudes. This AMC is amended to remove any altitude limit to ensure UAS Organisations consider the airspace above the coast in general instead of a specific altitude limit.</i>
113	AMC1 UAS.30.b(a)3vi.a	HQ AVNCOMD	Para b.i - Airspace Integration FARPs/remote/satellite airfields can be established throughout Defence training areas and operating Units that are not familiar with this may be a hazard. For unfamiliar organisations it may be beneficial to list defence ranges and training areas to confirm the existence of active airfields/FARP/Air assault staging areas and treat all with equivalent separation		<i>Language added to the AMC to cover permanent and temporary landing areas in Defence training areas.</i>
114	AMC2 UAS.30.b(a)3vi.a	HQ AVNCOMD	Para .v(a) – Due Regard 'Where the UAS: 'rate of climb or descent' 'rate of climb or descent' not always available or can be consistent with some flight mission system/commanded manoeuvre set-ups. Would 'change of altitude displayed and Climb/Descent Angle' be more permissive but still safe?	RoC / RoD should not be relied upon, this can change quickly unlike a crewed aircraft.	<i>Further consultation with the commenter identified that the language is suitable.</i>



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115	AMC2 UAS.30.b(a)3vi.a	HQ AVNCOMD	Para .v(b) – Due Regard 'integrity, accuracy' "meets the integrity, accuracy, availability and continuity of service requirements of a DASA- authorised standard" - what is that standard?	Provide some guidance on the standard and requirements of the UAS Unit/organisation if this is a common requirement for standard scenarios and not subject to the UASOP process.	<i>The relevant standard has not yet been published. This section of due regard is placed to provide the option when the standard is published.</i>
116	AMC2 UAS.30.b(a)3vi.a	HQ AVNCOMD	Para .vii – Typo AMC reference "vii. only if unable to comply with AMC UAS.30.b(a)3via paragraphs i-vii, over non-territorial waters, and:" Should read 'AMC2 UAS.30.b(a)3vi.a paragraphs i-vii'	Add AMC '2' for accuracy and '.a' format	<i>Error corrected.</i>
117	GM UAS.30.b(a)3vi.a	HQ AVNCOMD	Para .g.i(a) - Due Regard and Airspace Integration (AUS) 'within 3 NM in any direction.....of a non-controlled aerodrome' correct to 'controlled aerodrome'?	Check correction is valid	<i>Error corrected.</i>
118	AMC UAS.30.b.(a)3vi.b	HQ AVNCOMD	Para .a - Planning requirements (AUS) 'Typo: 'must determination population at risk', correct to '....determine population at risk'	Typo correction	<i>Error corrected.</i>
119	AMC UAS.30.b(a)3vi.b	HQ AVNCOMD	Para b.iii - Planning requirements (AUS) - 'Red Areas'"Suggest change to direct that the transition from orange to Red is the last safe point for flight termination or immediate landing to be initiated; after this point a commanded flight termination for being in a red zone risks UA descending into the area you are aiming to protect	If sustained flight is possible and link is active, UA should be turned to heading for shortest possible track out of red area. If link is active but UA is not responding to commands, FTS may result in realisation of hazard (if it works at all) Add clarification that Captaincy decision is required not to immediately terminate the flight if positive control back to Orange Area is available, or FTS may not be the sensible option noting the proximity to GP/Populous area, and that continued flight to clear that area may be the best solution.	<i>DASA provided additional guidance in Volume 3, published in parallel to DASR UAS.</i>
120	AMC UAS.30.b.(a)3vi.b	HQ AVNCOMD	Para .c - Planning requirements (AUS) - Adjacent area The adjacent area is understood to still be part of the area at risk but is listed as a different area; suggest including adjacent area as 'iv' to 'Area at Risk' as well as including the purpose of the adjacent area as to be informed of the risk to UA flyaway.	AMC UAS.30.b.(a)3vi.b.d should also change if this is accepted to remove adjacent area as a separate consideration to area at risk	<i>Suggestion incorporated and further adjacent area guidance added to the ground risk planning GM.</i>



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121	Adjacent Area - General	HQ AVNCOMD	The adjacent Area is understood to consider the uncommanded/uncontrolled departure of the UA from the operating area to be informed of the potential risk to general population but this is not applied consistently and is perceived to be additional staff effort without increase safety benefit. The same UAS can be operated under Open, spec A and Spec B Category and does not require the same assessment resulting from a potential flyaway from technical failure or operator input error, further, the risk to flyaway from operator error increases for Open category where there is scope for reduced training requirements. Recommend an organisational acceptance of perceived risk to population outside of operating area and remove requirement for adjacent area assessment for <25kg to align to the understood focus of the SORA being at Group 3 UAS	It is acknowledged that Consideration of adjacent areas is important it is recommended to remove prescriptive and staff intensive requirements and give GM to guide UAS organisations to implement a process to consider 'areas of concern' in adjacent areas that may include CI, high density airfields (yes, this is relating to air traffic where adjacent area is at population, but it is still an area of concern that may need to be addressed for potential fly away), or large short term public gatherings (eg sporting events and festivals); controls can include increased supervision and authorisation, and operating area limitations. BVLOS/night is not assessed to be an additional factor.	<i>Whilst UAS.40 does not impose the same requirement for adjacent areas, the category is much more restrictive in operating areas and does not warrant the equivalent prescription. However, Guidance Material is added to UAS.40.6 to outline the concept of adjacent areas to ensure UAS.40 UAS Organisations give due consideration prior to operations.</i>
122	Area at risk - General	HQ AVNCOMD	Similar to LSN 121 (15 in submitted feedback), the same UAS can be used as a Spec category or Open but spec category requires area at risk assessment with defined boundaries and qualitative/quantitative assessment of risk to population over subjective assessment; Open category defines lateral separation. It is understood that justification is around the standard scenarios allowing BVLOS and night operations, however, it is suggested that that the lateral separation (and/or other controls) is suitable across all standard scenarios and should deviate from SORA with organisational (Defence) acceptance.	The basis of this suggestion is because the application of the avoidance of GP in the operating area for slower/smaller systems (MRUAS) is the same between operating categories. It is proposed that even when VLOS, an RP is not able to safely determine the lateral separation when not positioned in close proximity to the UA and will rely on on-board camera to avoid overflight and maintain lateral separation. This is the same as BVLOS. The additional consideration of safety functions during BVLOS (eg RTH and possible overflight) is then tending towards compounding emergencies. Controls eg training and supervision, should be appropriate to facilitate a standard GP avoidance methodology across all Categories for lower risk platforms	<i>The CRE permitted for UAS.40 is more constrained than for those under the standard scenarios, thus the differences in ground risk controls. Additionally, the ground risk planning procedures in the standard scenarios are less restrictive than indicated by the commentary and permit a similar approach to that proposed in the commentary. However, the expanded permissions under the standard scenarios do require additional rigour in planning. Volume 3 material and further education will assist the Aviation Safety community in applying those requirements.</i>
123	AMC UAS.30.b.(a)3vi.b	HQ AVNCOMD	Figure 2 - Planning requirements (AUS) Figure 2 'Adjacent' area should be a boundary buffer that extends the outline of the contingency/operating Area & Orange/Red buffers by 3 mins of ground track, not a different shape?	Correct diagram to align with operating area and buffers boundary.	<i>Diagram amended.</i>



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124	AMC UAS.30.b.(a)3vi.b	HQ AVNCOMD	Figure 3 - Planning requirements (AUS) Adjacent area in the centre of the red area is misleading; the adjacent area is assessed to understand risk to population from flyaway and has a higher population assessment value; where the intent for this figure is to represent the avoid area that is assessed to be too high of a risk to fly over in case of an unintended decent	Suggest removal of 'adjacent area' labelling and either leave blank or colour completely red to reflect avoidance requirement (while considering recommendation at LSN 13 (in submitted feedback) that flight termination and/or immediate landing after the transition from the orange area is assessed to increase likelihood of hazard.	<i>This terminology is intentionally aligned to JARUS SORA and is correct for the application. Volume 3 material will provide additional guidance.</i>
125	AMC UAS.30.b.(a)3vi.b	HQ AVNCOMD	Figure 3 (error should be 4) - Planning requirements (AUS)Figure 4 is labelled as Figure 3 (repetition from the diagram immediately above it.	Correct diagram title 'Figure 4'	<i>Error corrected.</i>
126	AMC UAS.30.b.(a)3vi.b	HQ AVNCOMD	Figure 3 (error should be 4) - Planning requirements (AUS) Figure 4 displays adjacent area outside of the green area in addition to the central avoid; if the intent is to display the only identified avoid area within a maximum possible operating range then the outer adjacent area is irrelevant, should be removed and note given to display that it is not a requirement.	If there is intent to display a defined AO where the UA may be launched from any location within the green area but there is also the central avoid area, this indicates orange and red buffer is not required	<i>Diagram amended to display the orange and red areas to depict an operation protected externally and internally through the complete area at risk concept.</i>
127	AMC UAS.35(a)2i	HQ AVNCOMD	Safety and reliability (AUS) Include provision for an approved aviation test and evaluation organisation to assess the safety and reliability where OEM competency cannot be assured or UAS are assembled by the UAS Organisation with commercially available and manufactured components	gives avenue to operate UAS over non controlled land where the safety and reliability has been assessed by an approved organisation	<i>Where OEM competence cannot be assured, variability in manufacturing processes may go undetected. A test organisation would not be able to verify safety and reliability through test procedures without conducting an OEM assurance activity.</i>
128	UAS.35(a)3.i.b	HQ AVNCOMD	Request provision included to allow for conditions for 'commanded airspeed' to be used instead of 'maximum possible commanded airspeed'. GM could give further guidance to offer examples like a proven ability to limit airspeed of the UA (through either UA programming (within UAS Organisation approved CRE) and/or independent verification and mission crew for supervision.	UA may have the ability to be reliably limited by the RP, risk relating to speed is not eliminated but likelihood of UA malfunction or human error leading to exceeding the 'maximum possible' and impacting a standing person is very lowProgrammable altitude is accepted as an appropriate technical risk control to contain UA in an area in UAS.35(d)b.i.Applicable to all regulations that state maximum possible. Has the potential to restrict approvals that AVNCOMD can already approve under a standard scenario and would require more UASOPs.	<i>DASA provided flexibility to AUOs by removing '...possible...' which enables an AUO to operate a UAS capable of flying faster, but self-limiting through systemic risk controls. Given that DASA assures an AUO's systemic risk controls, this is a pragmatic means to provide that suggested flexibility.</i>



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LSN	Updated DASR Reference	Unit or Organisation	Comment or suggested change	Further Explanation where provided	DASA response
129	UAS.35(b)1	HQ AVNCOMD	Dimension and airspeed are limiting and only considers small MRUAS; Army is already trialling one to many for OWL-B and that exceeds this limitation, requiring a UASOP. Suggest expansion of these dimensions because the standard scenario is only offered to an Authorised UAS Organisation.	The risk to air traffic is mitigated through use of RA/MOA and the risk to population is also mitigated by defence controlled land with IP/MEP and prescribed adjacent area limitation. Currently, proposed amendment would limit what AVNCOMD can already approve under a standard scenario and would require more UASOPs.	<i>The examples cited that exceed UAS.35(b)1 are candidates for simple UASOPs. The existing UAS.35(b) bounds the permitted hazards under the standard scenario, but do not prevent expedited UASOPs where the applicant can demonstrate robust controls for larger/faster UAS.</i> <i>DASA may publish expanded standard scenarios in the future where repeatable risk controls become evident.</i>
130	AMC UAS.35(b)5	HQ AVNCOMD	Para b.ii "IAW a single ATC clearance" but operation for 35(b) is RA/MOA only, not a CTR.	to meet perceived intent of this AMC suggest change to 'ACA approval' vice 'ATC clearance'	<i>Some RA are operated by ATC.</i>
131	UAS.35(c)1	HQ AVNCOMD	35c mandates TEAU input that appears to slow process for lower risk T&E that AVNCOMD currently has the ability to manage. Is the endorsement required for each proposed evaluation activity/approval or is the regulation scope intended to give an enduring endorsement?	If there is scope to include guidance to an endorsed internal procedure that allows for the organisation's OIP to detail procedures that allows for flexibility in approving the T&E activity without bespoke TEAU endorsement depending on scope of proposed T&E.	<i>See LSN 39.</i>
132	UAS.35(c)3	HQ AVNCOMD	Include Military CTR as an option for T&E when the AUO assesses the suitability of the test IRT the UA and surrounding areas.	On defence land is still a requirement; the TEAU endorsement and AUO consideration may determine that the risk associated with the test (eg smaller UAS) is not elevated to be in a CTR. Approval from the ACA and controls that are applied through ATC separation equates to a ROZ within the CTR per GM DASR.UAS.35(b)3i	<i>CTR is not the equivalent of RA for the purpose of due regard. CTR can be considered for RA on a case-by-case basis where appropriate, pending provision of agreements with relevant airspace authorities.</i>
133	AMC UAS.35(d)	HQ AVNCOMD	Para b.i. - Technical Risk controls States "deterministic RDA". Remove "deterministic to account for an approved RDA of other types"		<i>Drafting error amended. Remaining references to deterministic removed given the need to expand the standard scenario to include other RDA types.</i>
134	UAS.35(d)6	HQ AVNCOMD	Include allowance for one-to-many after inert OTM trials under 35b.	Progression of some weaponised UAS testing will include UA that are capable of OTM and should be accounted for in the weaponised testing standard scenario to allow for a complete operational effect post evaluation.	<i>The suggestion provided is a candidate for a simple UASOP (as per LSN 129).</i>



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135	UAS.36(a)1. or UAS.35(a)3.iii	HQ AVNCOMD	With a minor amendment to either 36a UA dimension/speed (for an AUO) or to 35a airspace requirements, an AUO has potential to approve operations with the need for a UASOP or avoid difficulties observed in obtaining TRA (see LSN 34). Maturing UAS operations under the DASRs and oversight provided by an MAO/AUO can allow for expansion of either airspace requirements for lower risk/capable UAS (35a) or increase the size provision (36a) to allow for safe approvals without additional staff work.	Use case = Puma AE/LE used on OP RES and request for operation of Puma over remote national park in uncontrolled airspace (monitor ADF personnel (activity risk mitigation)) wingspan = AE 2.8, LE 4.6 max IAS = 41 knots GM for UA dimensions states that the dimensions are to account for the theoretical risk of UA striking a standing person and resulting in fatality assuming no additional controls to prevent it. Puma wingspan exceeds listed dimension but the majority of the Mass is centralised in the airframe with a MTOW less than MRUAS that have similar MTOW but meet the dimension requirements.	<i>The simple UASOP process currently provides sufficient flexibility to handle these unique operations without the need for broader standard scenario permissions.</i>
136	UAS.36(a)3	HQ AVNCOMD	Paras i and ii Lightly Populated Environments vs 50 ppl/km2 Variation in wording between GM UAS.10 (areas vs environment). GM UAS.36(a)3i and ii are the same metric IAW GM UAS.10		<i>The numerical metric is now deleted given the duplication with the updated GM UAS.10 definition metrics.</i>
137	UAS.36(b)1	HQ AVNCOMD	UAS.36.(b).1 - UA commanded airspeed 145 knotsAdd AMC to allow unrestricted dimensions for MAO/AUO. The provision would account for standard use of UAS that exceed the listed dimensions but have CRE assessed and managed by an MAO/AUO and are either a safe and reliable OEM delivered UAS or one endorsed by an approved TEAU via 35c evaluation.	Allows for standardised training and operational use for larger/faster systems with the appropriate oversight. This would limit current Approvals Army has issued and would require a UASOP - UAT and C-UAS/Anti Air. There are options to approve and use this type of UAS under 35c as the T&E standard scenario doesn't have the same restrictions, and the current approvals are relating to UAS used to support a life fire range; but would require clarification of the AUO ability to approve without formal T&E requirements and not actually a T&E activity. This may suggest an alternate amendment to 35c to change to "advanced UAS operations" where T&E is permissible as a subset.	<i>DASA amended UAS.35(c) to enable high speed UAS for ongoing operations instead of amending UAS.36(b). This enables AUOs to operate high speed UAS under standard scenario.</i>



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138	UAS.36(a)	HQ AVNCOMD	UAS.36(a) limited operations over non-Defence Controlled Ground or Water. This standard scenario appears to limit the scope of approvals that are currently available to an AUO and are not feasible under 35a (due to RA requirements as well). Population assessment across all UAS size will require UASOP where previous scenario allowed for approval with AUO defined and implemented risk controls. Suggest:- an amendment to the population assessment to allow an alt means of compliance through other controls (per current 35b (read LSN 16 (in submitted feedback)) or- a provision for the above that applies to MAO/AUO only, or- amendment to 35a to allow for options outside or RA/MOA for <25kg UAS, OR- provision under UAS.40 to allow for night and BVLOS for an MAO/AUO only	Additional option could be another UAS.35 standard scenario for 'advanced operations over non-Defence Controlled Ground or water' that replicates current flexibility to approve VS operations in any airspace as well as setting conditions with GM for approvals for larger UAS with consideration to operational scenarios (security/CT operation and DACC). This may also be an issue rectified through education/GM to detail the ability to conduct subjective at risk assessments with localised assessment and control that do not require qualitative/quantitative assessment with population data. This appears that it will limit approvals that have been issued by AVNCOMD this year. Consultation before NPA response submission suggests that the subjective and localised assessments will allow for approvals without UASOP; suggesting it is primarily education.	<i>Further discussion with AVNCOMD identified that the perceived limitation did not exist within the scope of the regulation as written. Volume 3 guidance will expand on the application of ground planning for these operations.</i>
139	UAS 40(a)4	HQ AVNCOMD	Suggest addition of 'operate with one UA per RP...'		Amended, refer to LSN 23.
140	Whole DASR UAS	HQ AVNCOMD	Temporary RA While the provision is listed for the use of TRA, including the method and authority, the experience has shown that TRA is not a feasible solution outside of emergency/operational scenarios.	Request through JACC to CASA for TRA in an area that is away from routine civil traffic has seen a denial of the request; the DASR relying on TRA as a safety control but CASA does not seem to be willing to consider this as justification. Suggest DASA consider engagement with CASA to investigate options for increasing likelihood of success (for reasonable requests). Alternatively, consider further maturing of DASR.UAS to allow greater flexibility for AUO to approve operation outside of RA/TRA.	<i>Defence manages a large number of Restricted Areas, so in many cases they are a robust and relatively simple risk management option. The DASR UAS does not exclude UAS from operating outside RA's; the purpose of giving these primacy is to encourage the safety community to exploit the available RA airspace in the first instance whenever practicable.</i>

