



DEFENCE AVIATION SAFETY AUTHORITY

**COMMENT RESPONSE DOCUMENT TO
NPA 2021/007 – DASR ORO.30 FLYING SUPERVISION AND FLIGHT
AUTHORISATION**

INTRODUCTION

1. **General.** This Comment Response Document (CRD) summarises DASA's agreed regulation changes as a result of the Notice of Proposed DASR Amendment (NPA) process to NPA 2021/007, and finalises public consultation on the NPA. DASA will consider arguments opposing the views expressed in this CRD only in exceptional circumstances. Any member of the regulated community having arguments to support an appeal against the decisions documented in this CRD may petition DASA.
2. **Background.** DASA released NPA 2021/007 (*DASR ORO.30 Flight Authorisation and Flying Supervision*) for regulated community comment on 30 Aug 21. The period for public comment closed on 13 Sep 21. DASA subsequently consulted with each environmental command HQ to ensure DASA responses to NPA feedback were acceptable.

ANALYSIS OF COMMENTS

General

3. DASA received 260 comments¹ in response to NPA 2021/007. The comments are individually listed in Annex A together with their corresponding DASA responses.

Environmental command endorsement positions

4. Environmental command HQs provided endorsement to NPA 2021/007 as follows:
 - a. HQFAA accepted the proposal without change
 - b. HQ AVNCOMD and HQAC advised the proposal was acceptable, but would be improved if changes defined in Annex A were made.
5. **DASA response.** The majority of feedback has been accepted and incorporated into the revised regulation. DASA forwarded the revised draft back to each environmental command HQ, and received subsequent endorsement.

Environmental command resource implications

6. No environmental command HQ advised that additional resources would be required as a result of NPA 2021/007.
7. **Transition plan.** DASA has incorporated a transition plan with the update to DASR ORO.30. In this plan, DASA will provide a 12 month transition period, commencing on the date of publication of DASR ORO.30. This transition period will allow the regulated

¹ Six general and 254 specific comments.

community to make the necessary changes to their flying supervision and flight authorisation management systems. DASA will not enforce compliance with any new requirements introduced by the revised DASR ORO.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 Comments Response Document is authorised.

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WGCDR

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11 Mar 22

Annex:

- A. NPA 2021/007: DASR ORO.30 *Flying Supervision and Flight Authorisation* – Regulated Community Feedback

NPA 2021/007: DASR ORO.30 FLYING SUPERVISION AND FLIGHT AUTHORISATION – REGULATED COMMUNITY FEEDBACK

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
Gen1	General	HQAC A9	<p>1) The recognition of Flying Supervision is welcomed and we actually believe that it should be elevated above that of Flight Authorisation. Proper flying supervision is a holistic approach towards ensuring Suitability for Flight with the flight authorisation process as an administrative element. It is of note that we have a Flying Supervisor's Course of which only a small element is to do with Authorisation. We go so far as to suggest that the regulation could be called 'Flying Supervision', with Authorisation being dropped from the title.</p> <p>2) Other changes which are suggested below are the recognition that Supervision happens at all levels throughout a SQN, and that AUTHO responsibilities are not just the bailiwick of a FLTCDR.</p> <p>3) We query the need for definitions of 'Flight' and 'Mission' as they do not actually appear to be used as standalone terms within the Regulation. Wheels are generally understood to be round; is there any need to define flight? We consider that there is likely to be more harm than good if the definitions are not assessed for their applicability and possible unintended consequences on other DASRs and associated uses.</p> <p>4) The regulation includes reference to ACFS operations which we consider to be out of place given that they are under Sponsor control per the DASR.NDR, not under a MAO.</p> <p>5) The intent of this NPA also needs to remain outcomes based, to allow for the methods and recording practices to evolve from a paper based era of the OA82 into an electronic era using multiple means of communications such as ULTRA, objective documents, email and text messaging.</p>		<p>1) DASA recognised the relative importance of Flying Supervision by bringing it forward in the title. DASA also retained 'Flight Authorisation' in the title to ensure readability and searchability (all FLTAUTH requirements are contained in this IR). Consequently, the IR order has also been modified, with Flying Supervision requirements brought forward, ahead of Flight Authorisation.</p> <p>2) Noted. However, AMC ORO.30(a)2a.vii. states that FLTAUTHO duties are not typically delegated below FLTCDR level—with limited term delegations to a lower level allowed to meet specific requirements.</p> <p>3) 'Flight' appears six times as a stand-alone term in this IR, 29 times in AMC, and nine times in GM. Similarly 'Mission' appears four times as a stand-alone term in AMC and five times in GM. Consequently, DASA defined 'Flight' to enable consistency in interpretation. DASA confirmed the CAA 1988 Act definition for 'Flight' is precise (eg does not apply to 'flight time'). Further, the term 'flight' rarely appears as a stand-alone term in other DASR. Lastly, while the term 'mission' is used widely in DASR, the proposed definition does not introduce inconsistencies.</p> <p>4) Under DASR.NDR all DASR apply unless specifically exempted or derogated. The derogation listed in ORO.30 is only for ACFS.</p> <p>5) DASA agrees that DASR.ORO.30 needs to remain outcome-based as far as practicable. Hence, DASA introduced options of a FLTAUTH record in hard, soft or electronic copies.</p>

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
Gen2	General	ACG	Feedback from ACG WGs is that proposed amendments are pretty much in line with current practices and won't significantly impact ACG Flying Ops. The proposed changes may require some tweaking to SIs but no show stoppers from an ACG perspective.		Nil DASA response required.
Gen3	General	AFTG	1) The following comment was in relation to a subsequently removed HQAC comment: (BLUF AFTG does not agree with the proposal to use the 'block to block' definition for flight time due to the implication for misrepresenting pilot experience, specifically for pilot-initial trainee pilots, who naturally take significant time pre-take-off but after dispatch). Otherwise: The proposal is acceptable but would be improved if the following changes listed in this spreadsheet were made. 2) Further, original DI(AF) OPS 1–10 Annex B, vide the attached PDF, regarding flight authorisation for trainee pilots, was not originally replicated in OAREG guidance when the DI was withdrawn. Hence it also has not been considered in this DASR, nor is it mirrored in a AC SI or an AFSI. The content should be reviewed for applicability in Air Command and in DASR. For example: <i>Qualified pilots, not Type Rated, undergoing flying instructor initial and conversion and pilot conversion in PC-21 and unqualified pilots (undergoing pilot-initial training) are authorised as Aircraft Captain IAW the relevant LMP in AFTG.</i> ie AFTG conforms, inter alia, to constraints within the cancelled DI(AF) OPS 1–10 Annex B, IAW SFARP risk mitigation for pilot training.		1) DASA does not propose to change the definition of 'flight time' as defined by the relevant Service. 2) ICW AFTG MAO staff DASA revised AMC ORO.30(a)3a.viii to incorporate concepts from DI(AF) OPS 1–10 Annex B as follows: a. DI(AF) OPS 1–10 Annex B did not require non-executive Flight Instructors to complete either Flying Supervisor's course or unit equivalent training, on the basis of the following: <i>Due to the limited nature of this delegation and the supervisory training provided on Flying Instructor courses, the Operational Airworthiness Authority or Operational Airworthiness Authority Representatives may waive the requirement for non-executive flying instructors to attend a formal flying supervisor course.</i> b. DI(AF) OPS 1–10 Annex B detailed restrictions on solo and mutual sorties following certain maintenance activities. DASA reintroduced these restrictions in AMC ORO.30(a)3a.viii c. DI(AF) OPS 1–10 Annex B also detailed restrictions on student pilots operating as Aircraft Captain in aircraft crewed by qualified pilots or instructors on Type. DASA reintroduced these restrictions in AMC ORO.30(a)3a.viii. LSN 172 refers.
Gen4	General	AMG	For the most part AMG is already compliant and satisfied with the DASR. There are some areas that could be improved as detailed in further comments below.		Nil DASA response required.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
Gen5	General	AWC	<p>AWC has reviewed NPA 2021/007 and HQAC A9 OPAW initial feedback.</p> <p>AWC holds no major issue with the proposal, however wish to highlight a recent DASR Form 110 – DASR Query from GPCAPT Figtree (DoSA FT [Army/Air Force] & HTA) submitted to DASA via OBJ ref (BQ27286377). Brief summary of this query is as follows:</p> <p>‘The current DASR implies that Military Permits to Fly (MPTF) exist for flight operations only ('to fly'). However, there are some ground test activities, considered on a case-by-case basis, where I consider it prudent for additional safety assurance via the issuing of an MPTF.</p> <p>As the Delegate of the Safety Authority (Flight Test - Army / Air Force) I am required to make these determinations as to when to issue a Military Flight Test Permit. In applying the DASR there are no definitions of the terms 'Flight' and 'Flight Operations' in the DASR glossary of terms.</p> <p>To facilitate assurance I have extended my interpretation of 'flight operations' to include, for example:</p> <ol style="list-style-type: none"> 1. High speed aborts in a different C/R/E, and 2. Rotors-turning ground events on helicopters in a different C/R/E <p>While I consider this position to be conservative, it also remains value adding in select cases. As such, I seek a defined DASA interpretation, and for inclusion in the DASR glossary of terms, for both 'Flight' and 'Flight Operations'. Suggest this nuance could be a driver for needing a robust definition for ‘flight’ and ‘flight operations’ and resultant implication on Flight Auth & Flying Supervision compliance activities’.</p>		<p>A new definition has been added for 'Flight Related Operations', as follows:</p> <p><i>Flight Related Operations refer to those operations which while not strictly meeting the definition of Flight warrant consideration of the application of Flight Authorisation and related Aviation Hazard controls. Such operations may include: high-speed aborts, rotors-turning ground events on helicopters, ground runs (excluding ground runs conducted by maintenance personnel as a part of routine maintenance activities) and taxiing.</i></p>

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Gen6	General	SRG	<p>Should the AC Flight Planning Process remain for Take-off performance, significant resourcing implications would be realised across 42 and 92WG.</p> <p>The workforce balance is heavily weighted towards Mission Crew within 42 and 92WG units, due to the extensive Mission requirements of said platforms. This drives a demand for FLTAUTHO to be extended to those with a Mission Crew background vice pilot qualification only.</p> <p>Due to the detailed consideration for aircraft normal and emergency performance there would be an increased reliance upon these pilot qualified FLTAUTHOs.</p>		<p>DASA amended ORO.30 GM to address the review of performance planning expected during the FLTAUTH briefing, as follows:</p> <p><i>The intent is to ensure the Aircraft Captain discusses performance planning for the Flight at the FLTAUTH brief. The FLTAUTH should, for example, ensure that the planned flight will enable the aircraft to avoid all obstacles, throughout all phases of flight by a safe margin; and ensure the fuel, and weight and balance calculations are accurate. Where standard operating conditions exist (Flight out of normal operating base with no adverse conditions or no aircraft marginal performance expected for the Flight), this may be a simple discussion. However, there may be other cases where obstacles, environmental, and required aircraft performance (normal and emergency) for the expected runway conditions, warrant additional controls. In these latter cases the FLTAUTHO should consider all available controls, and if necessary include an independent review of aircraft performance criteria (including for example, engine out performance). Where the Aircraft Captain is inexperienced, or Flight Planning indicates the planned Flight may approach conditions leading to marginal aircraft performance, the FLTAUTHO, if a non-pilot, should self- assess whether they hold the competency to conduct the FLTAUTH. Where necessary the FLTAUTH should be referred to a pilot FLTAUTHO that is current and holds a category on the relevant Aircraft Type.</i></p>
Gen7	General	FAA	The proposal is acceptable without change		Nil DASA response required.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
1.	Cross-referencing and hyperlinking	AFTG	<p>The Basic Regulations include links that open up the DASR text when selected, This should be included in this IR</p> <p>For example GM ORO.30 Suitability For Flight should be hyperlinked so that: <i>Suitability For Flight * Aircraft flight where the risk is eliminated or minimised so far as is reasonably practical to:</i></p> <ul style="list-style-type: none"> <i>a. loss of life or injury to aircrew and passengers</i> <i>b. loss to other personnel or property as a direct consequence of the flight</i> <i>c. loss of, or damage to, the aircraft.</i> <p>from the DASR Glossary displays in situ when the link is selected.</p>	Improves utility. Global editorial consideration.	DASA included hyperlinks within ORO.30 where practicable.
2.	Capitalising	AFTG	Capitalise DASR-defined terms used in the IRs	Consistency throughout DASR IRs	DASA amended ORO.30 accordingly.

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3.	DASR referencing	AFTG	<p>1) What is the DASR referencing standard used? For instance, Reference to ORO.30(a)2.(i) differs to the format of IR referencing (ORO.30.A) and the representation of numbering in GM and ACM. Why the difference?</p> <p>2) Reference ORO.30.(a).2.(ii) does not conform to ADF Writing Manual reference which omits unneeded stops. Reference should be ORO.30.A.2(i)?</p>		<p>1) The DASR nomenclature used in DASR.ORO.30 aligns to the DG DASA-endorsed DASR Style Guide, created to guide the development and updating of Regulations.</p> <p>2) There are inconsistencies between EMARs and the ADFWM. To maintain consistency within DASR, DASA elected to follow EMAR nomenclature as closely as possible. However, where EMARs were inconsistent, to apply ADFWM principles as far as possible.</p> <p>Under the EMARS there are different referencing formats for BR, IR, GM and AMC. These formats have been retained and are detailed in the DASR Style Guide. Additionally, unnecessary stops have been deleted.</p>
4.	Capitalising	AFTG	Do not capitalise unnecessarily. Paragraph headings are not capitalised other than the first word and proper nouns	ADF Writing Manual (ADFWM)	DASA amended ORO.30 accordingly.
5.	Use of 'the MAO' throughout	HQAC	DASR.AVFM uses 'the AM' throughout. Why is there a difference in this DASR with the use of 'the MAO' throughout?		<p>DASA amended ORO.30 to reflect 'MAO' as far as each context allows. This provides the organisation the flexibility to issue OIP at any organisational level, not exclusively at FEG-level by the MAO-AM.</p> <p>For example, where there is a requirement on an individual 'AM' to provide or ensure something, MAO-AM has been retained. Conversely, where the regulation refers more broadly to the organisation providing OIP, the term 'MAO' has been used.</p>

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6.		AMG		There's areas throughout that use similar but different terminology. Our preference is for the "MAO to ensure." This provides a flexible approach with where the information can be contained. This is a little crisper than "MAO must define..." or "MAO should define...". It could be interpreted that these must be held at the Group level vice WG SI's.	<p>DASA amended 'MAO must define' (or variations thereof) to 'The MAO must utilise a defined...'. This is consistent with the phrasing used in the recent DASR.AVFM, which does not constrain the ability for an AM to determine where the responsibility for defining OIP sits within the organisation. It is acceptable for the AM to delegate the responsibility for defining OIP (including to 'SME within the wing rather than the FEG HQ'). (Reference: CRD to NPA 2019-008)</p> <p>LSN 5 relates.</p>

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
7.	Definition of 'Flight'	HQAC	<p>1) Proposed definition conflicts with CASR definition. The proposed definition is more aligned with the CASA glossary of terms 'Flight Time'.</p> <p>2) This definition could have a number of implications throughout the DASR and therefore needs to be very carefully considered. AWC have identified a need within Flight Test Operations, but there is likelihood that defining 'flight' would lead to extrapolation to flight time. AMG have raised concerns with this likelihood, as have AFTG: AFTG does not agree with using the 'block to block' definition for flight time due to the implication for misrepresenting pilot experience, specifically for pilot-initial trainee pilots, who naturally take significant time pre-take-off after dispatch.</p> <p>3) What is the need for a definition of 'Flight' in the context of this Regulation?</p> <p>4) Notwithstanding the reason, why are there no examples where it is used as a definition (indicated by capitalisation) in its own right within the regulation?</p>	<p><u>CASR 1988 Vol 2 Part 61.010 Definitions for Part 61</u> flight means flight in:</p> <ul style="list-style-type: none"> (a) an aeroplane; or (b) a helicopter; or (c) an airship; or (d) a glider, other than a hang glider, powered hang glider, paraglider or powered paraglider; or (e) a gyroplane; or (f) a powered-lift aircraft. <p><u>CASR 1988 Vol 5 Dictionary (Regulation 1.4) Part 1 - Definitions</u> flight time has the meaning given by regulation 61.010.</p> <p><u>CASR 1988 Vol 2 Part 61.010 Definitions for Part 61</u> 61.080 Definition of flight time as pilot for Part 61 A person's flight time as a pilot is:</p> <ul style="list-style-type: none"> (a) the duration of the following flights: <ul style="list-style-type: none"> (i) a solo flight by the person; (ii) a flight in which the person receives flight training; (iii) if the person is a flight instructor—a flight during which the person exercises the privileges of his or her flight instructor rating; (iv) if the person is a flight examiner—a flight during which the person exercises the privileges of his or her flight examiner rating; and (b) the person's flight time as pilot in command; and (c) the person's flight time as pilot in command under supervision; and (d) the person's flight time as a co-pilot. 	<p>1) The proposed 'Flight' definition is not in conflict with the CASR definition. Rather, it nests above the CASR definition as the proposed definition is drawn from the CAA 1988, which in turn nests above the CASR.</p> <p>2) DASA does not propose to change the definition of 'flight time' as determined by the relevant Service. DASA added a note to the definition of 'Flight' as follows:</p> <p><i>DASA does not intend for the definition of Flight to affect the way in which environmental commanders define 'Flight Time'. Environmental Commanders may define 'Flight Time' or delegate the definition of 'Flight Time' to FEG Commanders.</i></p> <p>DASA amended the AMC to specify that Flight Authorisation may be conducted in respect of operations outside the definition of 'Flight' (eg for ground runs, taxiing and high-speed taxi operations) Note: DASA reviewed ORO.30 to ensure the applicability of Flight Authorisation as a Hazard control to all phases of an Aviation Mission (including for example an engine running off-load where a transport platform has come to a stop after landing at an intermediate destination during a Mission).</p> <p>3) A definition of both Flight and Mission was necessary to enable discrimination between aviation safety risks (associated with flight) and mission risks, which may be broader than aviation safety risks.</p> <p>4) 'Flight' appears six times as a stand-alone term in the IR, 29 times in AMC, and nine times in GM. DASA capitalised all instances.</p>

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
8.	Flight Authorisation definition	HQAC	<p><u>Comment:</u> Flight Authorisation * The process through which qualified and competent aircrew are approved to conduct a particular mission or task including the application of limitations or controls.</p>	<p>1) Does the existing definition of 'Flight Authorisation' now need to be reviewed in light of a proposed new definition for 'Flight'?</p> <p>2) The existing Flight Authorisation definition refers to mission and task, rather than flight. Should this become a 'Mission Authorisation'?</p>	<p>1) DASA agrees the definition of Flight Authorisation needs review, but not specifically due to the new definition of 'Flight'. The extant definition uses the term 'Aircrew' which does not cover Remote Pilots. The definition has therefore been modified to use the term 'Crew' which covers Flight Crew and Mission Crew, and which encompasses Remote Pilots.</p> <p>The modified definition of Flight Authorisation is as follows:</p> <p><i>The process through which qualified and competent Crew are approved to conduct a particular Mission including the application of limitations or controls.</i></p> <p>Additionally, the concept and definition of 'Flight Related Operations' has been introduced.</p> <p>2) No, the existing Flight Authorisation definition should not become 'Mission Authorisation'. While there is a requirement for regulatory clarity to define particular terms, including Flight Authorisation, the concept of Flight Authorisation is broadly understood amongst the Defence Aviation community. Flight Authorisation has been a long standing, stable and central element of the Defence Aviation Safety system for decades. While the regulatory definition is linked to the term Mission, the benefits of retaining the term 'Flight Authorisation' provides a stable concept to the broader Aviation community and outweigh any advantage of the closer link between the suggested title 'Mission Authorisation' and the term 'Mission'. Further, retaining the term 'Flight Authorisation' provides the Aviation community with a distinction from any mission authorisation concepts which may relate to non-aviation missions. Further, DASA removed the word 'Task' from the definition—as it is a subset of the new definition of 'Mission'.</p>

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
9.	Flight Operations	AWC	CDR AWC requests the inclusion of a definition for 'Flight Operation'	<p>The current DASR implies that Military Permits to Fly (MPTF) exist for flight operations only ('to fly'). However, there are some ground test activities, considered on a case-by-case basis, where the DoSA(FT) consider it prudent for additional safety assurance via the issuing of an MPTF.</p> <p>To facilitate assurance the DoSA(FT) has extended the interpretation of 'flight operations' to include, for example:</p> <ul style="list-style-type: none"> a. High speed aborts in a different CRE, and b. Rotors-turning ground events on helicopters in a different CRE 	<p>DASA added a definition for 'Flight Related Operations' as follows:</p> <p><i>Flight Related Operations refer to those operations which while not strictly meeting the definition of Flight warrant consideration of the application of Flight Authorisation and related Aviation Hazard controls. Such operations may include: high-speed aborts, engine running on-loads and off-loads, rotors-turning ground events on helicopters, engine ground runs (excluding ground runs conducted by maintenance personnel as a part of routine maintenance activities) and taxiing.</i></p>
10.	Definition of 'Mission'	HQAC	<p>1) What is the need for a definition of Mission in the context of this Regulation?</p> <p>2) As per Flight, if definition is needed, why are there no examples where it is used as a capitalised within the reg?</p> <p>3) If required, it should be contextualised for the purposes of this DASR and therefore maybe also consider the concept of a mission being multi-flight.</p> <p>4) Mission might be a better definition for use in this Regulation than Flight, as the use of task encapsulates more than just the flying, but everything around an aircraft operation.</p>	<p>There are 11 instances of mission in the reg, but only one is capitalised (GM ORO.30.A.3) in a description of the spectrum of an aviation activity (although the similar expression in the definition of Flying Supervision is not).</p>	<p>1) DASA defined both 'Flight' and 'Mission' to enable discrimination between Aviation Safety risks (associated with Flight) and Mission risks, which may be broader than Aviation Safety risks.</p> <p>2) DASA updated the document with the required capitalisations</p> <p>3) DASA updated AMC ORO.30(a)3xi(c)ii(A) to capture the scenario of 'multi-flights'.</p> <p>4) There was a need to define both Flight and Mission, both have been used within the regulation, to better contextualise Aviation Safety risks (associated with Flight) and Mission risks.</p>

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
11.	Mission Definition	HQAC	<p><u>Suggested change:</u></p> <p>One or more aircraft ordered to accomplish one particular task.</p> <p>The assignment of one or more aircraft to complete a specific task, which may involve multiple flights. (Typically an activity which begins with pre-flight planning requirements and ends after all post flight activities have been completed.)</p>	<p>1a) The proposed definition of 'mission' remains open to interpretation and does not clarify the start and end point of a mission.</p> <p>1b) In the context of flight authorisation does the mission end once the particular task has been accomplished (eg airdrop, target bombing, air-air refuelling etc); or does it end once the aircraft has returned to home base after the intermediate stops including hotel transits; or does it end once everyone has returned home safely?</p> <p>2) Does it include the pre-flight planning that does not involve an aircraft?</p>	<p>1a) DASA amended the definition of 'Mission' for improved clarity, as follows:</p> <p>'The assignment of one or more Aircraft to complete a specific task, which may involve multiple Flights.'</p> <p>1b) ORO.30 provides a regulatory control to the Hazard of 'compromised Suitability for Flight'. Hence, Flight Authorisation (and associated Mission) is inclusive of all elements of the relevant Flight or Flights, including recovery.</p> <p>The Hazards to personnel associated with activities outside of the Aviation environment (eg Hazards to members driving to their place of residence after a Mission) are not within the scope of Flight Authorisation and in this context, the Mission. This is because the DASR provide regulatory controls to Hazards associated with aviation. Hazards to members not directly associated with aviation are within the broader purview of WHS and the associated duty of care of a work supervisor.</p> <p>2) No it does not include pre-flight planning. Flight planning is a necessary pre-requisite to Flight Authorisation. However, additional Flight Planning may be an outcome of the Flight Authorisation process.</p>

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
12.	Flying Supervision definition	HQAC	<u>Suggested change:</u> The system concerned with the The function of oversight and management of aircrew in aviation operations (considering both safety and mission) to ensure the safety of Defence aviation through adherence to Flying Management System controls. (Typically an activity which lasts for a posting cycle, not constrained to a period associated with a particular flight).	Flying supervision is a function within the FMS. There is no need for the bracketed sentence; it adds nothing.	DASA amended ORO.30 accordingly, including consideration of LSNs 13-16.
13.	Flying Supervision definition	AMG	Refer to email attachment BP19748236	In trying to have a broad non-restrictive definition it has resulted in a lack of understanding. This has generated additional work in trying to understand and communicate who can be a flight autho. Attached is an email I drafted with the help ACPA staff. I think further detail in the GM explaining that there are two tiers of Flying supervision, The day to day workplace and then the more precise Flight auth process would be beneficial.	DASA amended ORO.30 accordingly, including consideration of LSNs 12 and 14-16.
14.	Flying Supervision definition	AFTG	Replace the parenthesis around 'considering both safety and mission' with commas for improved reading.	Parenthesis () is used for text which may be omitted. Although the sentence remains grammatically correct without the text in parenthesis, the text is needed in the sentence for scope.	DASA amended ORO.30 accordingly, including consideration of LSNs 12-13 and 15-16.
15.	Flying Supervision definition	AFTG	1) Replace 'aircrew' with 'Flight Crew' or 'Crew'.	'Aircrew' excludes UAS operated by non-aircrew.	DASA updated ORO.30 entries of 'aircrew' to 'crew' where appropriate, and also considered LSNs 12-14 and 16.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
16.	Flying Supervision definition	AFTG	<p>Perhaps: <i>Flying Supervision is more than Flight Authorisation and monitoring of any single flight. Supervision is an holistic task that includes:</i></p> <ul style="list-style-type: none"> <i>a. overseeing training, qualification and development of Crew</i> <i>b. the assignment of a suitable Crew to a task or Mission</i> <i>c. supervising the Mission planning and Flight Planning, Mission execution and post-Mission reporting and recording</i> <i>d. Flight Authorisation,</i> <p>is a better statement for the scope of what is Flying Supervision, which would be provided as a footnote not always visible text.</p>		DASA amended ORO.30 accordingly, including consideration of LSNs 12-15.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
17.	Flight Planning definition	AFTG	The Aircraft Captain's planning for the safe conduct of the flight based on considerations of: a. aircraft performance b. mission considerations c. relevant expected conditions on the route to be followed or in the area of operations and at the aerodromes concerned d. navigation sources and facilities associated with the route to be followed and aerodromes concerned e. the effects of normal and emergency and operating limitations on the above.'	This very long sentence is complex reading with multiple parenthetical clauses. Recasting the requirement in to sub-paras would improve reading. It also omits explicit reference to navigation sources enroute and at aerodromes. What are the previous operating limitations leading to the 'other operating limitations' being 'other' operating limitations in the NPA draft definition? The phrase 'or the area of operations' is not a parenthetical clause, hence the commas preceding and following the phrase are not required.	DASA incorporated the intent of the suggested change, with minor modifications to include capitalisation of defined glossary terms, and to improve brevity.
18.	Type Rated term	AMG	Comment	The use of the term 'type rated' was raised in a previous email to ACPA, as follows: <i>I notice the new regs still refer to 'Type rated' as a requirement for Flight Authos – Type ratings are a civil term as you know and do not have much relevance for ADF. No one has a Type rating as such that is clearly defined in a logbook etc.</i> <i>I only raise this as the 'Type rating' or 'Type rated' issue has caused confusion in the past and the definition of 'operating an aircraft' has been interpreted as not allowing non PLT aircrew to conduct authorisations. Is there any chance we can get rid of Type rated as a term? We have categories vice type ratings that are easily understood by all.</i>	DASA replaced the term 'Type Rating' with 'category on Type'.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
19.	ORO.30	HQAC	<u>Suggested change:</u> ORO.30 – FLIGHT AUTHORISATION AND FLYING SUPERVISION (AUS) ORO.30 - FLYING SUPERVISION AND FLIGHT AUTHORISATION (AUS)	Flying supervision includes authorisation and, if flying supervision is done correctly, flight authorisation is a formality rather than a critical defence required to ensure suitability of flight. It is also telling that we have a course called Flying Supervisors Course, not a FLTAUTHO Course. Acknowledged that there is more regulation around Authorisation, but invert the gravitas of the Policy – use ‘Flying Supervision’ as the Regulation title and possibly even drop Flight Authorisation from the headline.	DASA amended the title to bring forward Flying Supervision, to recognise its importance. However, DASA also retained Flight Authorisation in the title to support readability and searchability, as all the regulatory requirements for FLTAUTH are contained within this regulation.
20.	ORO.30.A	HQAC	<u>Suggested change:</u> The MAO must utilise a MAO-approved Flying Supervision and Flight Authorisation and Flying Supervision management system to ensure the Suitability For Flight for Defence aircraft flights.	Flying supervision is more important than flight authorisation and hence should be placed in front of flight authorisation. Suitability For Flight is an overarching concept, delete 'the'.	DASA amended ORO.30 accordingly.
21.	ORO.30.A	AFTG	Replace 'a MAO approved' with 'an AM approved'	A MAO, being an organisation, does not approve things. People with appropriate authority approve things.	DASR ORO.30 has been amended to reflect ‘MAO’ as far as each context allows. This provides the organisation the flexibility to issue OIP at any organisational level (ie unit-level), not exclusively at FEG-level by the MAO-AM. For example, where there is a requirement on an individual 'AM' to provide or ensure something, MAO-AM has been retained. Conversely, where the regulation refers more broadly to the organisation providing OIP, the term 'MAO' has been used. LSN 5 refers.
22.	ORO.30.A	AFTG	Delete 'flights' at the end of the clause.	FS and FA is not just about flight. Notwithstanding, use of flights to end '... Suitability for Flight for Defence Aircraft flights' is redundant and clunky English.	DASA amended ORO.30 accordingly.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
23.	ORO.30.A	AFTG	Capitalise 'Defence aircraft'.	Defence Aircraft is a defined term and thus needs use of a proper noun.	DASA amended ORO.30 accordingly.
24.	ORO.30.A	AFTG		The Permit Index issued under CASR 132 for WHRA is another consideration that should be included. While only applicable to NDRA Limited Category aircraft, it is nevertheless an important consideration to Flight Authorisation risk control. If not listed in this IR, then it should be listed as a consideration in the new NDR regulations.	<p>DASA included reference to 'risk controls as required by the relevant NAA or MAA' in ORO.30.</p> <p>DASA understands the Permit Index under CASR 132 relates to the operation of civil aircraft of a historic nature (under a limited certificate), which are ineligible for a standard CofA. The Permit Index grants an approval that permits Flight over a populous area once a risk assessment is carried out following the processes set out in the Part 132 Manual of Standards (MOS). Each permit index number is linked to a set of geographical operational restrictions (ie permit index 0 is the least restrictive, and permit index 3 is the most restrictive).</p> <p>With this change, for NDRA where CASRs apply, CASR 132, and therefore the Permit Index, will be applicable for the appropriate Aircraft Type.</p>
25.	ORO.30.A.1	HQAC	<u>Suggested reordering of ORO.30.A.1-2-3 into 3-1-2:</u> Flying Supervision management risk controls must be utilised. 4GM 4AMC	Per previously stated position re: relative importance of Supervision, recommend moving the Flying Supervision IR ORO.30.A.3 and elevating it in front of Flight Authorisation IR. This includes the relevant GM and AMC.	DASA amended ORO.30 accordingly.
26.	ORO.30(a)1	SRG	<p>The risk controls identified within this element are best highlighted within ORO.05 as the limitations placed upon operations via OPSPEC, MPTF and Command Clearance will change the operations.</p> <p>Review of ORO.05 does not specifically outline these requirements.</p>	<p>1) It appears the intent is to remind AUTHOs that OPSPEC, MPTF and CC apply, and to ensure ops are occurring IAW these directives.</p> <p>2) The sub points would be better in ORO05 to ensure all ops of the aircraft are noted.</p> <p>3) This seems to place responsibility on AUTHO, but the obligation lies with each operator, and the AUTHO merely provides confirmation measures have been considered.</p>	<p>1) DASA agrees.</p> <p>2) DASA will add the same obligation in ORO.05 for all operators. However it is also retained here as an obligation on FLTAUTHOs as a control to ensure Suitability For Flight</p> <p>3) Responsibility is not only on the FLTAUTHO. The obligation lies with both the operator and the FLTAUTHO to confirm consideration of the controls listed.</p>

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
27.	ORO.30.A.1	AFTG	Capitalise 'continuing airworthiness'	Continuing Airworthiness is a DASR defined term requiring proper noun capitals.	DASA amended ORO.30 accordingly.
28.	ORO.30.A.1	AFTG	Replace 'Initial' with 'Continued Airworthiness'	<p>Initial airworthiness' is used in DASR UAS but all of DASR 21 relates to 'continued airworthiness'. DASR 21 is most relevant to this clause. Small UAS do not have 'continued airworthiness' supported by a Design Organisation, hence, for other than type certified UAS and for type certified aircraft, there is likely a deliberate reason to use 'initial airworthiness' in UAS, which is the same meaning as for type certified UAS and aircraft.</p> <p>The Basic Regulations use 'continued airworthiness' for all aircraft.</p> <p>'Continued airworthiness' should be and 'Continuing Airworthiness' is a defined DASR term, not plain language adjective noun phrases, hence must be written in full and not compressed as 'continued and continuing'.</p>	<p>DASA replaced 'Initial and Continuing Airworthiness' with 'Initial Airworthiness and Continuing Airworthiness'.</p> <p>DASA notes that IA and CA are defined terms and agrees they should not be compressed as 'Initial and Continuing'. However, the reference to Initial Airworthiness is retained over the suggested 'Continued' Airworthiness (DASR structure diagram on the DASA website refers). This is because Initial Airworthiness covers design, production and certification aspects of an Aircraft Type. Whereas 'Continued' Airworthiness is considered to be a part of Initial Airworthiness, defining the ongoing obligations necessary to ensure the continued validity of a design (DASR Glossary definition refers). The term 'Continued Airworthiness' does not appear as a separately titled section within any part of BR or IR.</p> <p>Flight Authorisation must therefore also consider any IA risk controls relevant to Flight operations, which may be associated with design, production and certification (eg operations under a MPTF supporting initial development, production or certification activities).</p> <p>LSN 73 refers.</p>
29.	ORO.30.(a).1(ii)	HQAC	<u>Suggested change:</u> the flight conditions imposed through DASR 21.A.708, in respect of an any approved Military Permit To Fly (MPTF)	<p>Replace 'an' with 'any'.</p> <p>There could be more than one MPTF.</p>	DASA amended ORO.30 accordingly.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
30.	ORO.30.(a).1 (iii+)	HQAC	<u>Insert a new clause at a new:</u> (iii) the flight conditions imposed through DASR M.A.301 (a) 2, in respect of any approved deferred defects	Deferred defects may entail flight conditions as well. This could be the case for MEL, CDL or other credible data sources used to defer defects.	DASA amended ORO.30 accordingly.
31.	ORO.30.(a).1(iii+)	HQAC	<u>Suggested change become sub para (iv):</u> (iv) risk controls as required by DASR.SPA.10, in respect of an any approved Command Clearance.	Replace 'an' with 'any'. There could be more than one CC.	DASA amended ORO.30 accordingly.
32.	ORO.30.A.3(i)	HQAC	<u>Comment:</u> the provision of a Flight Authorisation mechanism for the identification of potential hazards and controls independent of the Aircraft Captain	Is the process independent of the Captain if an authorisation brief includes them?	Flight Authorisation is an independent mechanism for the identification of hazard controls to that which would be accomplished by the Aircraft Captain alone. The necessary inclusion of the Aircraft captain in the Flight Authorisation brief does not detract from the independence of Flight Authorisation. In the exceptional case of self-authorisation, while the same individual is both the Aircraft Captain and Flight Authorisation Officer, the independence of the Flight Authorisation mechanism is preserved as far as practicable by virtue of: a. The individual is acting in separate roles as Aircraft Captain and Flight Authorisation Officer b. The FLTAUTH is supported by a checklist.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
33.	ORO.30.A.2(ii)	AFTG	Replace 'derogation to' with 'derogation from'.	The BRs exclusively use 'derogate from', which is consistent with the Macquarie Dictionary examples: derogate/'dɛrəgeɪt/ (say 'deruhgayt) Rare –verb (t) (derogated, derogating) 1. to belittle or disparage. –phrase 2. derogate from, a. to detract from, as from authority, estimation, etc.: to fail will derogate from one's work as leader. b. to degenerate from: to derogate from one's previous good character. [Latin dērogātus, past participle, repealed, taken or detracted from] –derogation, noun	DASA amended ORO.30 accordingly.
34.	ORO.30.A.2(ii)	SRG	Use of “by derogation” is not required.	The structure of this paragraph implies that the regulations contained within the sub paragraphs can relax upon adherence to the former, hierarchal conditions. Use of the term “derogation” is likely to induce confusion as it is a legal term and is not required for the application of these regulations.	DASA has not removed the phrase indicating that this is a derogation clause because ORO.30.A.2(i) obliges Flight Authorisation independent of the Aircraft Captain. Hence, by definition, a clause providing relief from that requirement is a derogation clause (Ref: <i>Introduction to Defence Aviation Guidebook</i> S2.1 refers).
35.	ORO.30.A.2(ii)	AFTG	1) 'Reference to ORO.30(a)2.(i) differs to the format of IR referencing (ORO.30.A) and the representation of numbering in GM and ACM. 2) Why the difference? 3) Reference ORO.30.(a).2.(ii) does not conform to ADF Writing Manual reference which omits unneeded stops. Reference should be ORO.30.A.2(i)		1) DASA amended ORO.30 accordingly. 2) There is inconsistency between EMARs and the ADFWM. To maintain consistency within DASR, a DASA decision was made to follow EMAR nomenclature as closely as possible, and where EMARs were inconsistent (or silent), to apply ADFWM principles. Under EMARS there are different formats for IR, GM and AMC - these formats have been retained and are described in the DASR Style Guide. 3) DASA amended ORO.30 IAW the ADFWM.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
36.	ORO.30(a)2.(ii)(a)	AFTG	Replace 'authorising officers' with 'a FLTAUTHO'.		DASA amended ORO.30 accordingly.
37.	ORO.30.A.2(ii)(b)	HQAC	Suggest deletion: ADF Currency Flying Scheme (ACFS) participants, in the absence of Command direction, must 'self-authorise' using AMC provided in this regulation. 4AMC	1) Delete all wrt ACFS. 2) ADF Currency Flying Scheme should not be included as the aircraft used are not operated by a MAO. (See ORO.30.A). 3) Any requirements within DASR which the ACFS Sponsor felt needed to be applied would be covered via the application of the applicable DASR.NDR regulation.	Comments for 1) and 2) noted. However, BR.15 'Basic Principles and Applicability' is consistent with JD 21/2021, and by default, applies all DASR to all aircraft (including NDRA), unless AltMOC is approved by DASA. Self-Authorisation is a regulatory control to the Hazard of Suitability For Flight for ACFS. Hence, DASA retained the ACFS derogation, and will update the NDRA regulation to clarify the above BR.015 requirements. 3) The ACFS Sponsor is not the decision-maker WRT the applicability of DASR (see above). DASA amended ORO.30 to read 'The MAO or Sponsor'.
38.	ORO.30.A.2(ii)(b)	HQAC	<u>Suggested change if para remains:</u> ADF Currency Flying Scheme (ACFS) participants, in the absence of alternative Command Sponsor direction, must 'self-authorise' using AMC provided in this regulation.	Only if this IR must stay: add 'alternative' between 'of' and 'Command'. It would at least be in keeping with the existing IR. If this IR must stay, given that ACFS flights are NDR, they are governed by that Reg and therefore it should be 'Sponsor' vice 'Command'.	DASA amended ORO.30 to read 'unless the Sponsor directs otherwise'.
39.	ORO.30.A.2(ii)(b)	HQAC	Use of Command.	This use of Command does not tie with a later use. It is replacing the use of ENVCDRs in the existing DASR here, but relates to a CO later? Is it the intent to use this term more throughout the DASR suite? If so, it may need defining.	LSN 38 refers.
40.	ORO.30.A.2(iii)	AFTG	Replace 'Officer' with 'official' as for GM ORO.30.A.2(d)(ii)		DASA has not incorporated the feedback. The accepted terminology is Flight Authorisation Officer, not Flight Authorisation Official. LSN 41 refers.
41.	ORO.30.A.2(iii)	AFTG	add '(FLTAUTHO)' to follow 'Flight Authorisation Official'		LSN 40 refers.
42.	ORO.30.A.2(iv)	AFTG	Replace 'derogation to' with 'derogation from'.		DASA amended ORO.30 accordingly.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
43.	ORO.30.A.2(ii)	SRG	Use of “by derogation” is not required.	The structure of this paragraph implies that the regulations contained within the sub paragraphs can relax upon adherence to the former, hierarchal conditions. Use of the term “derogation” is likely to induce confusion as it is a legal term and is not required for the application of these regulations.	LSN 34 refers.
44.	ORO.30.A.2(iv)	AFTG	1) 'Reference to ORO.30(a)2.(iii) differs to the format of IR referencing (ORO.30.A) and the representation of numbering in GM and ACM. 2) Why the difference? 3) Reference ORO.30.(a).2.(iii) does not conform to ADF Writing Manual reference which omits unneeded stops. Reference should be ORO.30.A.2(iii)		1) DASA amended ORO.30 accordingly. 2) There is inconsistency between EMARs and the ADFWM. To maintain consistency within DASR, a DASA decision was made to follow EMAR nomenclature as closely as possible, and where EMARs were inconsistent (or silent), to apply ADFWM principles. Under EMARS there are different formats for IR, GM and AMC - these formats have been retained and are described in the DASR Style Guide. 3) DASA amended ORO.30 IAW the ADFWM.
45.	ORO.30(a).2(iv)b	HQAC	<u>Suggested change:</u> MAOs of approved Flight Test organisations are exempt from Type Rating requirements for flight test activities where both Flight Test activities where the FLTAUTHO:	Very clunky use of English in the initial sub para (b) with 'both'. This suggestion would have 'the FLTAUTHO' removed from each sub-sub para (1) and (2), and 'and' included at end of (1).	DASA amended ORO.30 to remove the FLTAUTHO from the sub-paras. However, ADFWM has removed the inclusion of 'or' or 'and' from the penultimate sub-para. Hence, it is necessary to retain 'both' to indicate that compliance with this derogation clause requires both sub-paras to be satisfied.
46.	ORO30.A.2(iv)b	AFTG	Capitalise second flight test	DASR term	DASA amended ORO.30 accordingly.
47.	ORO30.A.2(iv)b	AFTG	Replace 'MAOs of' with 'MAO-AM of an'		DASA amended ORO.30 to read 'an approved Flight Test organisation is exempt from category on Type requirements for Flight Test activities where the FLTAUTHO both...'
48.	ORO30.A.2(iv)b	AFTG	Replace 'organisations are' with 'organisation is'		DASA amended ORO.30 accordingly.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
49.	ORO30.A.2(iv)b(1)	AFTG	Delete comma after 'Flight Test System Specialist).		DASA amended ORO.30 accordingly.
50.	ORO.30.a.2.v	HQAC	<u>Suggested change:</u> the Flight Authorisation Officer and Aircraft Captain must sign certify the Flight Authorisation FLTAUTHO Record record before flight	1) Flight authorisation record keeping is progressing from OA82 paper based signatures to electronic means of certification via ULTRA or other digital mechanisms. Certification may include signature, digital signature, text message, email, objective storage. 2) Digital signatures are not the only means of providing an electronic means of flight authorisation (eg text and email, etc).	1) DASA amended ORO.30 to better reflect the FLTAUTHO record content intent. Sufficient guidance already exists to allow a FLTAUTH record to be documented via use of a hard copy form, soft copy form or an electronic means. DFSB ASIR 37SQN 'C-130J Loadmaster Entanglement during Dispatch of Air Sea Rescue Kit - Jervis Bay NSW, of 15 Jun 20' also refers. 2) DASA amended 'sign' to certify'. LSN 53 refers.
51.	ORO.30.A.2(v)	AFTG	Replace Flight Authorisation Officer with FLTAUTHO		DASA amended ORO.30 accordingly.
52.	ORO.30.A.2.(v)	AFTG	Lowercase 'Record'		DASA amended ORO.30 accordingly.
53.	ORO.30.a.2.vi	HQAC	<u>Suggested change:</u> (vi) by derogation to ORO.30(a)2.(v), Flight Authorisation or changes to Flight Authorisation may be given verbally <i>or via alternative means.....</i>	There are alternative communication means that include verbal, written and other electronic means (eg text and email).	DASA amended ORO.30 to include 'or via electronic means'. Additional means available now and in the near future are likely to be electronic, so use of this terminology, while providing broad scope, still applies a limit to the acceptable means of compliance. LSN 50 refers.
54.	ORO.30.a.2.vi.b	HQAC	<u>Suggested change:</u> b. wherever possible, the Aircraft Captain or FLTAUTHO should leave a written record of a verbal authorisation on the ground with a responsible person prior to the flight, as determined within the verbal authorisation.	Verbal FLTAUTHs are usually under less than ideal circumstances. These may be due to the AC being on the tarmac with an issue, or because the FLTAUTHO is ooo (eg at home) at the time of the AUTH. Either way, generally one of the two are in a better position to amend the FLTAUTH record or leave a written record of the verbal auth (eg text or email etc). The concept of leaving a written FLTAUTH with the refueller or under a rock is not contemporary practice.	DASA amended ORO.30 as follows: '...wherever possible, the Aircraft Captain or FLTAUTHO should leave a written record on the ground with a responsible person, or an electronic record, of a verbal FLTAUTH prior to the Flight, as directed by the FLTAUTHO.' LSN 55 refers.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
55.	ORO.30.a.2.vi	AMG	(vi) by derogation to ORO.30(a)2.(v), Flight Authorisation or changes to Flight Authorisation may be given verbally. However: a. the details of any verbal Flight Authorisation should be recorded in the Flight Authorisation record as soon as practicable b. wherever possible, the Aircraft Captain should leave a written record of a verbal authorisation on the ground with a responsible person prior to the flight.	Point 'b.' places the burden on the AC. I understand in the event of an aircraft accident this provides another piece of evidence which was recorded prior and even more important if the Captain is no longer able to give evidence however this responsibility should be placed on the autho as well. The integrity of the captain and autho should mean this is the same. I acknowledge that there can be different interpretations of what was agreed to. The additional time placed on crews and the distraction required when there is a change of auth could have more of a detrimental effect on flight safety. In the example where a minor auth amendment is created, the captain after seeking approval would then need to either write something in hard copy to give to someone that may or may not be there or send something electronically without signal. This may constitute a discussion on the level of effort that is required to achieve this further distracting from the task at hand. Current practice is to have the flight autho place the amended details in the OA82. The captain takes their word and the brief is thorough to ensure no confusion. A single system that did flight auth, logbook and currencies that could be used on the EFB would reduce the number of times this is required. It would also allow the captain to confirm that the auth was the same as what the autho put in the system.	LSN 54 refers.
56.	ORO.30.A.2(vi)	AFTG	Replace 'derogation to' with 'derogation from'.		DASA amended ORO.30 accordingly.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
57.	ORO.30.A.2.(vi)	AFTG	<p>1) 'Reference to ORO.30(a)2.(v) differs to the format of IR referencing (ORO.30.A) and the representation of numbering in GM and ACM.</p> <p>2) Why the difference?</p> <p>3) Reference ORO.30.(a).2.(v) does not conform to ADF Writing Manual reference which omits unneeded stops. Reference should be ORO.30.A.2.(iv)b(2)</p>		<p>1) DASA amended ORO.30 accordingly.</p> <p>2) There is inconsistency between EMARs and the ADFWM. To maintain consistency within DASR, a DASA decision was made to follow EMAR nomenclature as closely as possible, and where EMARs were inconsistent (or silent), to apply ADFWM principles. Under EMARS there are different formats for IR, GM and AMC - these formats have been retained and are described in the DASR Style Guide.</p> <p>3) DASA amended ORO.30 IAW the ADFWM.</p>
58.	ORO.30.A.2(vi)	AFTG	<p>Replace '.. verbally. However' with '... verbally, however'</p>		DASA retained the text as-is, as the ADFWM allows for either case.
59.	ORO.30.A.3	HQAC	<p>Recommend moving the Flying Supervision IR and elevating above initial and continuing risk controls IR. This includes the relevant GM and AMC.</p>	Per previously stated position re relative importance of Supervision.	DASA amended ORO.30 accordingly.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
60.	ORO.30.B	AFTG	Should there be GM ORO.30.B pointing to DASR NDR, and obligations for due diligence under WHS Act and BR.15?	<p>Agree the MAO-AM is not required to perform flight authorisation and to have management systems in place for NDR 'in-support' type operations; however, the MAO is still accountable for due diligence to the safe execution of the task for a flight that is in scope of DASR NDR and BR.15:</p> <p>BR.015 Basic Principles and Applicability (EASA BR Article 4)</p> <p>a. Aircraft, including any installed product, part and appliance, which are:</p> <p>(1) owned by Defence;</p> <p>(2) operated exclusively for or on behalf of Defence;</p> <p>(3) the subject of statutory airworthiness responsibilities placed on Defence by the national civil airworthiness authority;</p> <p>(4) designed or manufactured by an organisation for which the Authority ensures safety oversight;</p> <p>(5) foreign military aircraft operating within national airspace shall comply with this Regulation.</p> <p>b. Personnel involved in the operations of aircraft referred to in BR.15.A shall comply with this Regulation.</p> <p>c. Operations of aircraft referred to in BR.15.A shall comply with this Regulation.</p> <p>d. Defence aerodromes, including equipment, shall comply with this Regulation. Personnel and organisations involved in the operation of these aerodromes shall comply with this Regulation.</p> <p>e. By way of derogation from BR.15.D, the Authority may decide to exempt from the provisions of this Regulation a Defence aerodrome with only a few movements per year.</p>	<p>DASA has not included obligations on the MAO to apply due diligence for the safe execution of an NDR 'in support' type operation (ie a NDR operation in which the crew are non-Defence aircrew).</p> <p>Rationale: The obligation to put in place 'safety controls' such that 'it is reasonably expected that suitability for flight will not be compromised' for such NDR operations is drawn from DASR.NDR.05b.</p> <p>DASA will seek to provide additional clarity on Sponsor's obligations WRT 'due diligence' for the safe execution of the task for NDR 'in support'-type of operations, when updating DASR.NDR.</p>

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
61.	ORO.30.B	AFTG	Lowercase 'Non, Registered' and 'Aircraft'.	Non-Defence registered aircraft is not defined in the DASR Glossary, hence is not a proper noun. Therefore formats are: 'Non-Defence registered aircraft' to commence a sentence, and 'non-Defence registered aircraft' when used within a sentence.	Non-Defence Registered Aircraft is a DASR Glossary defined term. In this example it was written incorrectly and has been amended.
62.	ORO.30.B	AFTG	Reword: 'By derogation from ORO.30.A'		DASA amended ORO.30 accordingly.
63.	ORO.30.B	AFTG	Replace 'MAO' with 'MAO-AM'.		DASA amended ORO.30 to read: <i>By derogation from ORO.30(a), for NDRA Flights that are solely conducted by non-Defence Flight Crew, the requirements of ORO.30(a) do not apply...</i>
64.	ORO.30.B	AFTG	1) Reference to ORO.30(a) differs to the format of IR referencing (ORO.30.A) and the representation of numbering in GM and ACM. 2) Why the difference?		1) DASA amended ORO.30 accordingly. 2) There is inconsistency between EMARs and the ADFWM. To maintain consistency within DASR, a DASA decision was made to follow EMAR nomenclature as closely as possible, and where EMARs were inconsistent (or silent), to apply ADFWM principles. Under EMARS there are different formats for IR, GM and AMC - these formats have been retained and are described in the DASR Style Guide. DASA amended ORO.30 IAW the ADFWM.
65.	ORO.30(b)	HQAC	<u>Suggested change:</u> Non-Defence Registered (NDR) Aircraft. By derogation, the MAO is exempt from the requirements of ORO.30(a) for Non-Defence Registered Aircraft flights that are solely conducted by non-Defence flight crew Flight Crew under a recognised MAA or NAA.	Should flight crew be capitalised?	DASA amended ORO.30 accordingly.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
66.	ORO.30(b)	HQAC	<u>Comment:</u> Has the scenario been considered where a Flight Test qualified person is on-board an NDRA for the purposes of observing or conducting a test?		Yes, DASA considered the scenario described. In the case where an ADF member (who is Flight Test qualified) is observing a test solely conducted by non-Defence Flight Crew under a recognised MAA or NAA, the requirements of ORO.30(a) do not apply (although, requirements of CDF Directive 12/2016 would apply). For the case where the ADF member is conducting the test, the requirements of ORO.30 do apply, as the derogation is not applicable.
67.	GM ORO.30.a	HQAC	<u>Suggested change:</u> Purpose. (Context) Defence flight operations require careful consideration in both planning and execution to ensure safety. (Hazard) Given Depending on the operations' complexity, aircrew involved in their planning and execution may not adequately consider, monitor, and mitigate relevant aviation safety and mission factors, leading to potentially compromised Suitability For Flight. (Defence) This regulation requires the MAO to define Flying Supervision and Flight Authorisation and Flying Supervision requirements to provide an independent control of flight planning and execution, so that aviation safety risks are eliminated or otherwise minimised so far as reasonably practicable; and mission risks are appropriately managed.	1) Poor use of English. Not all operations are complex. 2) Flying Supervision occurs before, and is more important than Flight Authorisation.	1) DASA amended ORO.30 accordingly. 2) The order that requirements are discussed has been modified to provide greater emphasis on Flying Supervision.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
68.	GM ORO.30.a	AFTG	Replace 'aircrew' with 'the Flight Crew'.	'Aircrew' is imprecise in the context of this DASA IR and 'the Flight Crew' is more appropriate.	DASA replaced 'Aircrew' with 'Crew', which encompasses both 'Flight Crew' and 'Mission crew' (DASA Glossary), given the Hazard refers to aviation safety and mission factors (ie aircraft safety can be effected by elements outside of 'Flight Crew' control, but within the control of 'Mission Crew').
69.	GM ORO.30.a	AFTG	Replace 'MAO' with 'MAO-AM'	MAO-AM (person) has responsibilities and accountabilities under DASA, not the MAO (organisation).	DASA ORO.30 has been amended to reflect 'MAO' as far as each context allows. This provides the organisation the flexibility to issue OIP at any organisational level (ie unit-level), not exclusively at FEG-level by the MAO-AM. For example, where there is a requirement on an individual 'AM' to provide or ensure something, MAO-AM has been retained. Conversely, where the regulation refers more broadly to the organisation providing OIP, the term 'MAO' has been used. LSN 5 refers.
70.	GM ORO.30.a	AFTG	Capitalise 'flight planning'	'Flight Planning' is a DASA defined term and should be shown as a proper noun.	DASA capitalised 'Flight Planning'.
71.	GM ORO.30.A.1	HQAC	Suggested deletion: Under DASA ORO.05, the MAO is required to ensure that Defence-registered aircraft OIP is consistent with the aircraft Type's SOIU.	Although it can be considered that by complying with ORO.05 (ie operating within the SOIU, and as detailed in the AFM and OIP) that the aircraft OIP is consistent with the SOIU, there is little point in this GM, especially when it only addresses two of the six ORO.05 IRs and none of the next three sub-para (i), (ii), (iii).	DASA amended ORO.30 accordingly. LSN 72 refers.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
72.	GM ORO.30.A.1	AFTG	Delete this GM as it is neither adding value nor correct.	<p>1) The Basic Regulations include cross reference links that open the original text when selected. This should be applied here, if needed.</p> <p>2) DASA ORO.05 prescribes many things governing the operation of Defence Aircraft but ensuring the OIP is consistent with the SOIU for Defence registered aircraft is not one of them. This GM also omits NDR.</p> <p>ORO.05 – CONDUCT OF FLYING OPERATIONS 29 Apr 21</p> <p>(a) Defence registered aircraft must be operated:</p> <ol style="list-style-type: none"> 1.within the approved Statement of Operating Intent and Usage (SOIU) and Configuration Role and operating Environment (CRE) parameters 2.in accordance with the Type Certificate and MAOC limitations 3.in accordance with the procedures in Defence AIP, except as required by the NAA of the state of operation 4.as detailed in the Aircraft Flight Manual and applicable OIP 5.in accordance with Defence OIP, and 6.at certified aerodromes, non-certified aerodromes and any other non-defined areas where it is safe to do so. 	<p>1) DASA will apply hyperlinks where appropriate in the published version of the IR.</p> <p>2) DASA amended ORO.30 accordingly.</p> <p>LSN 71 refers.</p>

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
73.	GM ORO.30.A.1	AFTG	If GM ORO.30.A.1 is not deleted, replace 'Initial' with 'Continued Airworthiness'	<p>Initial airworthiness' is used in DASR UAS but all of DASR 21 relates to 'continued airworthiness'. DASR 21 is most relevant to this clause. Small UAS do not have 'continued airworthiness' supported by a Design Organisation, hence, for other than type certified UAS and for type certified aircraft, there is likely a deliberate reason to use 'initial airworthiness' in UAS, which is the same meaning as for type certified UAS and aircraft.</p> <p>The Basic Regulations use 'continued airworthiness' for all aircraft.</p> <p>'Continued airworthiness' should be and 'Continuing Airworthiness' is a defined DASR term, not plain language adjective noun phrases, hence must be written in full and not compressed as 'continued and continuing'.</p>	LSNs 28, 71, 72 refer.
74.	GM ORO.30.A.1.a	AFTG	Replace MAO with MAO-AM	MAO-AM (person) has responsibilities and accountabilities under DASR, not the MAO (organisation).	DASA deleted GM ORO.30.A.1.a.
75.	GM ORO.30.A.1	AFTG		Note that an SOIU is issued for an aircraft type operated in the MAO. The clause in GM ORO.30.A.1 could be appended with '... relevant to the MAO.' to fully prescribe the scope of MAO-AM responsibility for aircraft types that are operated by multiple MAOs, eg PC-21.	LSN 74 refers.
76.	GM ORO.30.A.1	AFTG	Replace 'Type's' with 'Type'.	Type's is possessive and the SOIU belongs to the MAO for the aircraft type not to the aircraft type.	LSN 74 refers.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
77.	GM ORO.30.A.2	HQAC	<u>Comment:</u> Flight Authorisation Approval Authorities. These are Command personnel SQN Commanding Officers have authority for the management of the Flight Authorisation system.	Who are Command personnel? Command has been used in place of the ENVCDRs in 30.(a).2.(ii)b, but that wouldn't fit here. The only person with approval authority is the Squadron Commanding Officer.	DASA amended ORO.30 GM using the term 'unit commanding officer'. In Air Force (as in Navy and Army) the FLTAUTHO Approval Authority can only be the unit CO, IAW AC SI(OPS) 1-10. Navy and Army have similar SIs. LSN 78 refers.
78.	GM ORO.30.A.2	AMG	Comment on Command personnel.	The use of the term "Command personnel" can be misleading since within RAAF there are streams such as "command" and "OAS". This could narrow the spectrum of allowable personnel down to FLTCDRs unintentionally. OAS provides a rich area of experience (some ex COs) that can reduce the workload on the unit executive. Having a clearer GM around this issue will provide confidence to the COs in delegating their authority to key personnel.	DASA amended ORO.30 GM using the term 'unit commanding officer'. The GM does not preclude OASS from being appointed as FLTAUTHO. Rather, it provides clarity on the obligation on MAOs and Sponsors to include in their FLTAUTH system a 'FLTAUTHO Approval Authority'. In Air Force (as in Navy and Army) the FLTAUTHO Approval Authority can only be the unit CO, IAW AC SI(OPS) 1-10. Navy and Army have similar SIs. LSN 77 refers.
79.	GM ORO.30.A.2	AFTG	Replace 'delegated' with 'with the'	The authority of a Commanding Officer is not delegated, it is inherent to the appointment of command. By whatever the means of appointment may be, the fact is that the individual has the authority to delegate flight authorisation responsibilities.	DASA amended ORO.30 accordingly.
80.	GM ORO.30.A.2	AFTG	Lowercase System Risk Controls; 'Command personnel'	Neither a DASR term nor proper noun. 'Command' is adjectival not a proper noun in this DASR GM description, hence lowercase not capital.	LSN 77 refers.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
81.	GM ORO.30.A.2.b	HQAC	Include flying supervision within the Figure 'ORO.30.A.2-1 — Flight Authorisation's Role in the FMS'.	As the regulation has been expanded to specifically include flying supervision there is the opportunity to improve this diagram by including a Flying Supervision barrier. Recommend a cylinder that encompasses Aircrew and Mission, commencing prior to Competency Criteria and ending prior to Briefing, used to note the longitudinal time nature of supervision, rather than the flight authorisation 'snapshot and follow'. The diagram would need re-titling to encompass both flying supervision and flight authorisation.	DASA modified the diagram in consultation with HQAC A9 Staff to include a diagrammatical representation of 'Flying Supervision'. The dotted box added to the diagram (representing Flying Supervision), shows that Flying Supervision includes all of the identified controls, including Flight Authorisation where applicable. Of note, in this context the defences annotated 'approved' and 'applicable' represent the Flying Supervisor ensuring the Aircrew under their supervision refer to approved and applicable data (rather than the task of the Flying Supervisor approving the data).

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
82.	GM ORO.30.A.2.b	HQAC	<u>Suggested change:</u> The Need for Flight Authorisation. Flight crew Crew are qualified to operate Defence aircraft after they have been assessed as competent and fit to do so. However, owing to the complexity of Defence aviation ¹ (1. Aircraft configuration, crew composition, environmental conditions and individual mission requirements vary frequently), without an independent Flight Authorisation decision, real-time threats to operational aviation safety may bypass preventative controls within the Flying Management System (FMS). The lack of an independent Flight Authorisation decision will likely force sole reliance on flight crew post-event recovery actions to maintain safe flight operations (see Figure ORO.30.A-1). The process of authorising flight crew to operate Defence aircraft ensures the system controls are utilised to address the identified hazards.	Recommend replacing 'Flight Crew' with 'Crew' so as to not exclude some crew members who may not fit a precise interpretation of Flight Crew.	DASA amended ORO.30 accordingly.
83.	GM ORO.30.A.2.b	AFTG	Lowercase 'Need'	ADF Writing Manual	DASA amended ORO.30 accordingly.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
84.	GM ORO.30.A.2.b	AFTG	Capitalise Defence aviation; Defence aircraft; crew; flight crew;	DASR defined term	DASA amended ORO.30 accordingly.
85.	GM ORO.30.A.2.b	AFTG	Replace 'they have been' with 'being'.	Simplification	DASA amended ORO.30 accordingly.
86.	GM ORO.30.A.2.b	AFTG	Replace 'and fit' with 'and suitable'	Qualification and award of a Type Rating does not include a 'fit' assessment in the same context as 'fit' is used for health and fatigue purposes. 'Fit' in the context of behaviour to be awarded a qualification, Type Rating and categorisation is part of the competency assessment. 'Suitable' would be preferable to 'fit' in this context to distinguish the behaviour and long-term medical classification (suitable) from the short term unwell and fatigue considerations tied to 'fit'.	Agree, however, in this context the GM is referring to medical fitness. DASA updated GM to include the word 'medical', to remove ambiguity. Additionally, DASA added the term 'current' to provide further clarity. Use of the term 'suitable' may introduce ambiguity as 'suitability' (as suggested) is already included as part of the competency assessment. In this case 'medical fitness' would account for both short and long term medical classification.
87.	GM ORO.30.A.2.b	AFTG	Replace 'will likely' with 'may'.	How is the lack of independent Flight Authorisation 'will likely' proven? Will likely is at least 50% probability, DFSB uses a metric that 'likely' is more than 65%, which I conjecture is speculation in this context and is not necessary to the rationale for Flight Authorisation. 'May' is sufficient likelihood because SFARP is the requirement and Flight Authorisation is one of the controls applied to further reduce the likelihood of the associated hazards.	DASA amended ORO.30 accordingly.
88.	GM ORO.30.A.2.b	AFTG	Add 'performing' in the phrase 'flight crew performing post-event recovery action'	The flight crew are not the post-event recovery actions, they perform actions, hence a verb is required to create the action ... flight crew performing post-event recovery actions ...	DASA amended ORO.30 accordingly.
89.	GM ORO.30.A.2.b	AFTG	Replace 'ensures' with 'is intended to ensure'.	The flight authorisation process has the intent to ensure but whether or not it does is down to how well it is done.	DASA amended ORO.30 accordingly.
90.	Figure ORO.30.A.2-1 caption	AFTG	Replace 'Authorisation's Role' with 'Authorisation Role'.	Possessive form is incorrect English	DASA amended ORO.30 accordingly.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
91.	Figure ORO.30.A.2-1	AFTG	What is the stray 'Etc' bottom left of Figure ORO.30.A.2-1?		The diagram is a representation of the FMS. 'Etc' has been used in the extant DASR.ORO.30 regulation, and originally intended to show that each list was not exhaustive. DASA modified the diagram to now include 'Other' within each element, to clarify this intent.
92.	GM ORO.30.A.2.c	HQAC	<u>Suggested change:</u> '...as defined by DASR.ORO.10, are utilised. The outcome is that flight crew are authorised to perform specific roles in a particular aircraft Type within a planned environment and timeframe.	Recommend replacing 'Flight Crew' with 'Crew' so as to not exclude some crew members who may not fit a precise interpretation of Flight Crew.	LSN 82 refers.
93.	GM ORO30.A.2.d(i)	AFTG	Reword 'FMS controls are suitable and in place on flight-by-flight basis'	A flying supervisor needs to assess whether the FMS controls are suitable, and apply further risk management if they are not, as well as assessing that these FMS controls are active for the intended flights.	DASA amended ORO.30 accordingly.
94.	GM ORO.30.A.2.d(ii)	AFTG	Replace 'Officer' with 'official' as for GM ORO.30.A.2(d)(ii).	An 'officer' is not a defined term in DASR and hence 'officer' defaults to the definitions for officer in the Defence Act and WHS Act and, in the case of UAS, the authorised individual may not be an officer of the Navy, Army or Air Force, and, for all, may not be an officer of the PCBU.	DASA has not incorporated the suggestion. Under all foreseeable circumstances the FLTAUTHO will be an officer of the ADF. Even for UAS, the Air Operations DASR only apply to Certified (DASR.UAS.20) and Specific Category Type A (DASR.UAS.30) UAS. The rest of the UAS regulations are exempt from other DASR (ie including DASR.ORO.30) unless explicitly invoked by DASR.UAS.
95.	GM ORO.30.A.2.d(iii)	AFTG	Replace 'authority' in 'acceptance of authority for' with 'responsibility'.	Authority is granted, as defined in footnote 2, responsibility is accepted.	DASA amended ORO.30 accordingly.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
96.	GM ORO.30.A.2.d(iii)	AFTG	Which of the following is this 'fit' meaning: * well and unfatigued * suitable to the crew composition and CRE in '... aircraft flight by a competent and fit Aircraft Captain'.? As earlier described, 'suitable' should be the verb to describe the long term attributes of the aircraft captain and 'fit' to the short term.		DASA amended ORO.30 GM to include the word 'medically' before 'fit'. LSN 86 refers.
97.	GM ORO30.A.2.d(iii) footnote 2	AFTG	Perhaps <i>Flying Supervision and Flight Authorisation must include assessment of the crew as fit and suitable to perform the intended Mission.</i>	The Aircraft Captain has additional specific responsibilities above that of the Crew but the Crew as a whole is the focus of Flying Supervision and Flight Authorisation. An Aircraft Captain is a function of the DASR AIRCREW qualification system. Supervision and Authorisation is about matching Aircraft Captain to other Crew, to the mission and the CRE.	DASA removed the footnote. The wording of AMC ORO.30(a)2.xi(b)(iv) 'Crew are trained, competent and current' already covers the intent of the suggestion.
98.	GM ORO.30.A.2.d(iii)	AFTG	Capitalise flight crew		DASA amended ORO.30 accordingly.
99.	GM ORO.30.A.2.d(iv)	AFTG	Capitalise Defence aircraft		DASA amended ORO.30 accordingly.
100.	GM ORO.30.A.2.e	AFTG	Replace 'Officer' with 'official' as for GM ORO.30.A.2(d)(ii).		LSN 40 refers.
101.	GM ORO.30.A.2.e	AFTG		Is the abbreviation 'FLTAUTHO' needed in DASR? *It is introduced here but is then not used consistently in subsequent text, switching between the acronym and full text. *FLTAUTHO is not in the ADG nor is it in the DASR Glossary.	DASA included a definition for Flight Authorisation Officer (FLTAUTHO) and reviewed IR, AMC and GM to ensure consistent use of the abbreviation 'FLTAUTHO' where applicable.
102.	GM ORO.30.A.2.e	AFTG	Lowercase Technical Mastery	Not a DASR term nor proper noun.	DASA amended ORO.30 accordingly.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
103.	GM ORO.30.A.2.e	AFTG	Move footnote index 3 needs to immediately follow Technical Mastery	The footnote index 3 needs to go immediately following Technical Mastery to be consistent with authoring principles.	DASA has not incorporated the suggestion as it does not align with guidance in the ADFWM.
104.	GM ORO.30.A.2.e	AFTG	Lowercase Technical Mastery	Not a DASR term nor a proper noun.	DASA amended ORO.30 accordingly.
105.	GM ORO.30.A.2.e	AFTG	Reword: Accordingly, a potential FLTAUTHO candidate requires both time and aviation experience to develop the requisite knowledge and skills to perform the associated duties.	Ending the sentence at 'develop' makes no sense.	DASA amended ORO.30 accordingly.
106.	GM ORO.30.A.2.f.	HQAC	<u>Suggested change:</u> For flight crew, Flight authorisation competency is achieved and recognised through a controlled and progressive process of training and accumulated experience. A potential FLTAUTHO may should have demonstrated competency across the spectrum of operations for an aircraft Type prior to being delegated.	This paragraph is about flight authorisation, not flight crew.	DASA amended ORO.30y GM by replacing 'For Flight Crew' with 'FLTAUTH'. 'May' was also replaced with 'should'. LSN 108 refers.
107.	GM ORO.30.A.2.f	AFTG	Capitalise 'flight crew'		DASA amended ORO.30 accordingly.
108.	GM ORO.30.A.2.f	AFTG	Replace 'may' with 'should'.	A potential FLTAUTHO may have demonstrated competency across the spectrum of operations for an aircraft Type prior to being delegated.' does not make sense	DASA amended ORO.30 accordingly.
109.	GM ORO.30.A.2.f	AFTG	Replace 'delegated' with 'appointed'.	FLTAUTHOs are appointed with delegated authority and responsibility.	DASA amended ORO.30 accordingly.
110.	GM ORO30.A.2.g and h	AFTG	Rationalise GM ORO30.A.2.g and h	GM ORO30.A.2.g and h are synonymous	DASA simplified and combined sub paras g and h.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
111.	GM ORO30.A.2.g	AFTG	Reword Type Rated in DADR Glossary as follows: Type Rating * Qualification for Crew to operate a particular aircraft type, and for ground crew to maintain a particular aircraft type.	While 'Type Rated' is a defined DADR term, 'Type Rating' is not defined in DADR. However, 'Type Rated' appears in four places in the DADR IRs a fifth time in the Glossary. Conversely, Type Rating appears in many more instances in the BR and IR. Redefining 'Type Rated' in the Glossary, recasting the definition to 'Type Rating' would produce the minimal rework throughout the DADR IRs.	DASA amended 'Type Rating' and 'Type Rated' to 'category on Type' in all cases. LSN 18 refers.
112.	GM ORO.30.A.2.g	AFTG	Replace 'assure' with 'ensure'.	Selecting a person based on appropriate criteria ensures an outcome; verification assures that the outcome is being achieved.	DASA amended ORO.30 accordingly.
113.	GM ORO.30.A.2.g	AFTG	Lowercase Technical Mastery.		DASA amended ORO.30 accordingly.
114.	GM ORO.30.A.2.h	AFTG	Reword Having an initial Type Rating in addition to MAO-AM specified FLTAUTHO suitability criteria ensures a FLTAUTHO holds appropriate aircraft knowledge and experience that includes:	A MAO does not specify things, commanders and managers do, as does an MAO-AM. Recasting the sentence improves readability	Agree, but DASA has elected to retain 'MAO' as far as each context allows. This provides the organisation the flexibility to issue OIP at any organisational level (ie unit-level), not exclusively at FEG-level by the MAO-AM. For example, where there is a requirement on an individual 'AM' to provide or ensure something, MAO-AM has been retained. Conversely, where the regulation refers more broadly to the organisation providing OIP, the term 'MAO' has been used. LSNs 5, 69 and 114 refer.
115.	GM ORO30.A.2.h)(i)	AFTG	Replace 'type's' with 'Type'	Possessive form is incorrect English. Type is a DADR defined term	DASA amended ORO.30 accordingly.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
116.	GM ORO30.A.2.h(i)	AFTG	Captured' is the wrong verb. Replace with documented, defined, described, which are appropriate verbs.	Macquarie dictionary capture verb (t), past tense and past participle captured; present participle capturing. 1. to take by force or stratagem; take prisoner; seize: the chief was captured. 2. to take or seize according to the rules of a game or sport. 3. to achieve a likeness of in an artistic or literary medium. 4. Computers to transfer (information) to computer-readable form. 5. Physics (of an atomic or nuclear system) to acquire (an additional particle).	DASA replaced the word 'captured' with 'defined'.
117.	GM ORO.30.A.2.h(iii)	AFTG	Reword: '... nuances of a particular aircraft type.'	The phrase 'aircraft type nuances' makes 'aircraft type' an adjective describing the nuances. The need is to understand the nuances (noun) that the particular aircraft type (noun) may have.	DASA amended ORO.30 accordingly.
118.	GM ORO.30.A.2.j	AFTG	Lowercase 'practice'.	ADF Writing Manual	DASA amended ORO.30 accordingly.
119.	GM ORO.30.A.2.j(ii)	AFTG	Reword: 'Trainee pilots are tasked as Aircraft Captain to meet curriculum objectives during pilot training. Accordingly, the Flight Authorisation Approval Authority of a flying training unit may delegate Flight Authorisation of flights by trainee pilots as Aircraft Captain to approved flying instructors.'	Recasting the sentence from passive to active form removes the need for qualifying 'solo' and 'mutual' terms, which are not defined in DASR and also unnecessary. Trainee is the correct term for Defence personnel under training IAW the <i>Defence Learning Manual</i> . Replaces 'CO' with 'Flight Authorisation Approval Authority' which is the newly defined authority for managing flight authorisation.	DASA amended ORO.30 accordingly.
120.	GM ORO.30.A.2.k	AFTG	Lowercase Disclosure Requirements		DASA amended ORO.30 accordingly.
121.	GM ORO.30.A.2.k	AFTG	Replace 'crew disclosure of' with 'the Flight Crew disclosing'.	Grammar	DASA amended to read 'Therefore, the Crew disclosing factors that could potentially compromise Suitability For Flight is essential'. LSN 68 refers.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
122.	GM ORO.30.A.2.k	AFTG	Capitalise crew.		DASA amended ORO.30 accordingly.
123.	GM ORO.30.A.2.(iv)b.(2)	HQAC	<u>Comment:</u> The intent is for the FLTAUTHO to either be informed by a Type-qualified pilot as to the considerations relevant to the flight, or has completed a Type familiarisation course endorsed by the MAO-AM of the relevant aircraft.	Removes any confusion between whether the endorsement is from the aircraft's MAO-AM or the Flight Test MAO.	DASA amended ORO.30 GM by adding 'of the relevant aircraft', to improve clarity.
124.	GM ORO.30.A.2.(iv)b.(2)	AFTG	Lowercase Considerations		DASA amended ORO.30 accordingly.
125.	GM ORO.30.A.2.(iv)b.(2)	AFTG	Reference ORO.30.A.2.(iv)b.(2) does not conform to ADF Writing Manual reference which omits unneeded stops. Reference should be ORO.30.A.2(iv)b(2)		DASA amended ORO.30 accordingly.
126.	GM ORO.30.A.2.(iv)b.(2)a	AFTG	Delete 'either' in 'FLTAUTHO to either be'		DASA amended ORO.30 accordingly.
127.	GM ORO.30.A.2(iv)b(2)a	AFTG	Replace 'Type-qualified pilot' with 'pilot with a Type Rating'	Type-qualified is not defined in DASR	DASA modified terminology to 'category on Type' in all instances. LSN 18 refers.
128.	GM ORO.30.A.2(iv)b(2)a	AFTG	Delete comma after 'relevant to flight'		DASA amended ORO.30 accordingly.
129.	GM ORO.30.A.3	AFTG	Lowercase Management Risk Controls		DASA amended ORO.30 accordingly.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
130.	GM ORO.30.A.3.a	HQAC	<u>Suggested change:</u> a. Flight crew supervision Flying supervision includes oversight of the full spectrum of the aviation activity (Safety and Mission). The Flying Supervisor Flying Supervisors should be familiar with the competencies, capabilities and personal disposition of all crew that may require authorisation. Such knowledge forms the basis for sound flying supervision and enhances Flight Authorisation decision making.	First of all describe what flying supervision is, rather than describing what flight crew supervision is. Flying supervision includes air tasking, mission scheduling, crewing, mission planning, aircrew development and flight authorisation. Most of which are aspects of ORO.10 - Flying Management System. 'Flying Supervision' should be a collective concept rather than an individual FLTAUTHO responsibility; there also may be more than one Supervisor involved. A good flying supervisor will provide appropriate inputs prior to the Flight Authorisation briefing.	DASA amended ORO.30 accordingly.
131.	GM ORO.30.A.3.a	HQAC	<u>Comment:</u> a. Flight crew supervision includes the full spectrum of the aviation activity (Safety and Mission). The Flying Supervisor should be familiar with the competencies, capabilities and personal disposition of all crew that may require authorisation. Such knowledge forms the basis for sound Flight Authorisation decision making.	What is the context of 'Safety and Mission'? Why are they capitalised?	'Safety' in the context of the DASR refers to Aviation Safety. The mandate of the DASR is to provide regulatory controls for hazards to Aviation Safety. 'Mission' in this context refers to non-safety-related elements of the aviation activity. For example, a Flying Supervisor supervising the planning and conduct of a flypast would naturally consider both aviation safety (as required by the regulation) and other mission considerations (including the importance of making good the time on target in the interest of Defence's reputation). DASA amended ORO.30 GM with lower case for 'safety' and capitalisation for 'Mission', reflecting 'Mission' is now a defined term.
132.	GM ORO.30.A.3.a	AFTG	Replace 'Flight crew supervision' with 'Flying Supervision'		DASA amended ORO.30 accordingly.
133.	GM ORO.30.A.3.a.	AFTG	Lowercase Flying Supervisor.	Flying Supervision is a DASR defined term but flying supervisor is not	DASA amended ORO.30 accordingly.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
134.	GM ORO.30.A.3.a	AFTG	Capitalise crew		DASA amended ORO.30 accordingly.
135.	GM ORO.30.A.3.b	AFTG	Capitalise flight planning		DASA amended ORO.30 accordingly.
136.	GM ORO.30.A.3.c	AFTG	Add 'task programming,' in the phrase 'during task programming, Flight Planning and ...' 'Add 'Mission' in the phrase 'flight planning and Mission execution	Capitalise flight planning (DASR term). Task programming is a Flying Supervision activity.	DASA amended ORO.30 accordingly.
137.	AMC ORO.30.A.2	AFTG	Lowercase System Risk Controls		DASA amended ORO.30 accordingly.
138.	AMC ORO.30.A.2.a(i)	AFTG	Lowercase Management Responsibilities		DASA amended ORO.30 accordingly.
139.	AMC ORO.30.A.2.a(i)(a)	AFTG	Capitalise Flight Authorisation Approval Authority	Is this now a DASR defined term.	DASA removed the capitalisation, as the term is not defined in the glossary.
140.	AMC ORO.30.A.2.a(i)(a)	AFTG	Replace 'Flight Authorisation Officer (FLTAUTHO)' with 'FLTAUTHO'	Standardisation	DASA has not incorporated the feedback. This is the first use of 'FLTAUTHO' in AMC. IAW the DASR Style Guide, a term needs to be written in full for its first use in IR, GM and AMC.
141.	AMC ORO30.A.2(a)(ii)	AFTG	Replace 'Flight Authorisation Approval Authorities' and 'Flight Authorisation approval authorities' with 'A Flight Authorisation Approval Authority:'	Simplification	DASA amended AMC to read ' A FLTAUTH approval authority ...' The application of capitalisation is consistent with the use of paragraph headings in the ADFWM for non-defined terms.
142.	AMC ORO.30.A.2(a)	HQAC	<u>Suggested change:</u> 'Minimum Flight Authorisation system risk controls include defining :	Defining is redundant as it is restated in the sub- paras as appropriate.	DASA amended ORO.30 accordingly.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
143.	AMC ORO.30.A.2.a.ii.a-c	HQAC	<u>Suggested change:</u> ii. Flight Authorisation Approval Authorities. Flight Authorisation approval authorities: (a) should be able to appoint suitable FLTAUTHOs within the operating unit <i>and associated detachments or deployments via a written delegation</i> (b) should be able to approve the duties, responsibilities and limitations of a FLTAUTHO via a written delegation (c) may delegate Flight Authorisation to the Detachment Commander on deployments, or the most suitably qualified flight crew member, or both, ensuring clear guidance on any limits of the FLTAUTHO appointment.	1) The wording 'should be able to' invites confusion as to when this may not be allowed. 2) Paragraph (c) is not required. If the CO has the authority to appoint suitable AUTHOs per (a), then there is no need to describe a situation such as (c). If this AMC para is kept, how can a flight crew member be an AUTHO?	1) DASA removed the words 'be able to' from sub paras a and b. 2) DASA amended ORO.30 accordingly.
144.	AMC ORO.30.A.2.a.iii.c	HQAC	(c) FLTAUTHO Specialisation Definition. A <i>FLTAUTHO should be a pilot</i> . The MAO may specify what additional flight crew specialisations are suitable for FLTAUTHO duties. However, whenever practicable the FLTAUTHO should be a pilot.	The suggestion provides a change of emphasis so that a pilot is the preferred specialisation.	DASA amended ORO.30 accordingly.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
145.	AMC ORO.30.A.2.a.iii.d	HQAC	<u>Comment:</u> Flying Supervision Training Requirements. Flight Authorisation should only be delegated to an officer who satisfactorily completes Defence-endorsed Flying Supervision training that includes:	1) What is Defence-endorsed Flying Supervision training? 2) Whom may it be endorsed by? 3) Are there different levels?	DASA amended 'Defence-endorsed' to 'Service-endorsed' to better reflect that course endorsements would be provided by each Service. Army Aviation Flying Supervisor Training is within the Regimental Officer Intermediate Course (ROIC). It is not stand-alone and is delivered by the School of Army Aviation. Navy Aviation SI(NA) OPS 01-04 para 25 stipulates: a. FLTAUTHO Qualifying Workshop. New FLTAUTHOs must complete the HQFAA FLTAUTHO Qualifying Workshop, delivered at least twice per year. The Air Force Flying Supervisors course may be completed in lieu. b. FLTAUTHO SQN Initial/Refresher. SQN COs are responsible for the delivery of SQN type-specific FLTAUTHO training to cover type-specific aspects. Training is required for initial award of FLTAUTHO, change of Aircraft Type, and as an annual refresher. Air Force Air Force Flying Supervisor training is delivered by the Central Flying School (CFS) through a dedicated RAAF Flying Supervisors Course (111189, P002729). For comment 1) & 2), Service-endorsed Flying supervision training is therefore: a. For ARMY , Regimental Officer Intermediate Course, endorsed by School of Army Aviation b. For NAVY , FLTAUTHO Qualifying Workshop, endorsed by HQFAA c. For Air Force , RAAF Flying Supervisors Course, delivered by CFS, endorsed by HQAC 3) DASR does not require different levels of training. Note: 'Service' is capitalised based on its ADF Glossary definition, and to distinguish it from 'service' as a maintenance concept.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
146.	AMC ORO.30.A.2.a(iii)	AFTG	Lowercase Suitability Criteria		DASA amended ORO.30 accordingly.
147.	AMC ORO.30.A.2.a(iii)(a)	AFTG	Lowercase Qualification and Competency		DASA amended ORO.30 accordingly.
148.	AMC ORO.30.A.2.a(iii)(b)	AFTG	Lowercase Authorisations		DASA amended ORO.30 accordingly.
149.	AMC ORO.30.A.2.a(iii)(c)	AFTG	Lowercase Specialisation Definition		DASA amended ORO.30 accordingly.
150.	AMC ORO.30.A.2.a(iii)(c)	AFTG	Capitalise flight crew		DASA amended ORO.30 accordingly.
151.	AMC ORO.30.A.2.a(iii)(d)	AFTG	Lowercase training requirements		DASA amended ORO.30 accordingly.
152.	AMC ORO30.A.2(a)(iii)(d)	AFTG	Replace 'Officer' with 'official' as for GM ORO.30.A.2(d)(ii).		LSN 94 refers.
153.	AMC ORO30.A.2(a)(iii)(d)(v)	AFTG	Replace 'accident/incident study of' with 'study of Occurrence Reporting for related Aircraft Types'	Occurrence Reporting is the DASR defined term, see BR Appendix 1 and DASR Glossary. Also, an oblique must not be used to replace a conjunction.	<p>DASA amended ORO.30 to remove the oblique and replace the text as follows:</p> <p><i>...study of Occurrence Reporting, as well accident and incident reports from other global operators, of related Aircraft Types...</i></p> <p>Rationale: it is appropriate to also consider accident and incident reports from global operators of related Aircraft Types rather than to constrain this AMC requirement to Occurrence Reporting as defined by the DASR.</p>

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
154.	AMC ORO30.A.2(a)(iv)	AFTG	Is the FLTAUTHO review requirement of the person, to ensure the skill is retained, or the scope of the FLTAUTHO appointment?	<p>Review delegate (person) All FLTAUTHO delegates should undergo review at regular intervals, not exceeding 24 months, to ensure the delegate remains qualified and competent for appointment as a FLTAUTHO.</p> <p>Review of appointment (position) All FLTAUTHO appointments should undergo review at regular intervals, not exceeding 24 months, to ensure qualification and competency requirements for the appointment remain valid. A comma is required after 'intervals' to create the parenthetical phrase 'not exceeding 24 months'.</p>	<p>It is appropriate to review both the delegate and the appointment periodically. Hence, DASA amended AMC as follows:</p> <p><i>iv. FLTAUTHO periodic reviews. Reviews at regular intervals, not exceeding 24 months, of the following:</i></p> <p><i>(a) Delegates (people)—all FLTAUTHO delegates, to ensure the delegate remains qualified and competent for appointment as a FLTAUTHO</i></p> <p><i>(b) Appointments (positions)—all FLTAUTHO appointments, to ensure qualification and competency requirements for the appointment remain valid.</i></p>
155.	AMC ORO.30.A.2.a(iv)	AFTG	Lowercase Periodic Review Requirements	ADF Writing Manual	DASA amended ORO.30 accordingly.
156.	AMC ORO.30.A.2.a(v)	AFTG	Lowercase Further	ADF Writing Manual	DASA amended ORO.30 accordingly.
157.	AMC ORO.30.A.2.a(v)	AFTG	Lowercase Delegation	ADF Writing Manual	DASA amended ORO.30 accordingly.
158.	AMC ORO30.A.2.a(vi)	AFTG	Reword: The MAO-AM should identify the responsibilities associated with Flight Authorisation and ensure that suitable personnel within the chain of command to discharge those responsibilities are identified in OIP.	Grammar and simplification	<p>DASA amended ORO.30 as follows:</p> <p><i>vi. ...FLTAUTH responsibilities are executed through the normal chain of command. The MAO or Sponsor should define in OIP:</i></p> <p><i>the responsibilities associated with FLTAUTH</i></p> <p><i>suitable personnel within the chain of command to discharge that responsibility...</i></p>

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
159.	AMC ORO.30.A.2.a.vii	HQAC	<u>Recommend deletion:</u> FLTAUTHO appointments should not be lower than the designated flying supervisor level. However, limited term delegations to a lower level may be necessary to meet specific requirements.	FLTAUTHO appointments are for the Flight Authorisation Approval Authority to determine. There are many cases where FLTLT specialist aircrew are the most appropriately experienced FLTAUTHO yet they are not what might be considered a 'designated flying supervisor level' (ie SQNLDR Flight Commander). Would these 'limited term delegations' be any different to a normal FLTAUTHO appointment? Notwithstanding, there is no determination of what is considered to be a flying supervisor level. The Flying Supervisor qualification and all the other checks and balances in the other AMC are enough.	DASA amended AMC to explicitly allow for the appointment of OASS participants as FLTAUTHOs, as follows: <i>FLTAUTHO appointments should not be lower than the Flight Commander or equivalent level, with the exceptions of:</i> <i>(a) Flying Instructors</i> <i>(b) OASS participants.</i> <i>Notwithstanding, limited term delegations (for example, to a Detachment Commander for the duration of the relevant deployment) to a lower level may be necessary to meet specific needs.</i> Restricting the appointment of FLTAUTHOs below the Flying Supervisor level (intended to refer to the Flight Commander or equivalent level), recognises the importance of individuals holding the requisite experience and judgement (as well as Technical Mastery) as a pre-requisite for appointment as a FLTAUTHO. The AMC provides the flexibility for the appointment of other individuals (including OASS participants) as FLTAUTHOs within the limitations provided. Eliminating the AMC would allow unrestricted appointment of FLTAUTHOs below the designated Flying Supervisor level—which would be inappropriate.
160.	AMC ORO30.A.2.a(vii)	AFTG	What does 'limited term' mean?		LSN 159 refers.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
161.	AMC ORO30.A.2.a(vii)	AFTG	Delegation to non-executive flying instructors is usually an enduring delegation to a lower level and would not meet the any definition recognised as 'limited term'.		DASA recognises enduring delegations to non-executive flying Instructors may be appropriate. Accordingly, DASA amended the relevant AMC as follows: <i>vii. FLTAUTHO appointments should not be lower than the Flight Commander or equivalent level, with the exceptions of:</i> <i>(a) Flying Instructors</i> <i>(b) OASS participants.</i> <i>viii. Notwithstanding AMC ORO.30(a)3vii, limited term delegations (for example, to a Detachment Commander for the duration of the relevant deployment) to a lower level may be necessary to meet specific needs.</i> Additionally, AMC ORO.30(a)3a.ix details the additional requirements for non-executive flying Instructor FLTAUTHOs.
162.	AMC ORO30.A.2.a(vi), (viii), and (ix)	HQAC	vi. Flight Authorisation responsibilities are executed through the normal chain of command. <u>The MAO should identify in OIP the...</u> viii. Requirement for Self-Authorisation. Minimum requirements to exercise self-authorisation <u>should be defined in OIP</u> , including..... ix. Use of Non-unit Personnel as FLTAUTHOs. <u>The MAO should define in OIP the</u> circumstances	The underlining in these subparagraphs are examples of inconsistency in general language throughout the Regulation. There is no entity (eg MAO) assigned responsibility for defining the requirements in OIP in subparagraph (viii). There is differing language in the actions required in subparagraphs (vi) and (ix). Could the verb be the same? Are there different outcomes required?	DASA amended ORO.30 as follows: <i>vi. ...FLTAUTH responsibilities are executed through the normal chain of command. The MAO or Sponsor should define in OIP:</i> <i>the responsibilities associated with FLTAUTH</i> <i>suitable personnel within the chain of command to discharge that responsibility...</i> <i>...The MAO or Sponsor should define in OIP the minimum requirements to exercise self- authorisation...</i> <i>...The MAO or Sponsor should define in OIP the circumstances under which authorisations by non-unit personnel may be performed.</i>
163.	AMC ORO.30.A.2.a(viii)	AFTG	Lowercase Self-Authorisation		DASA amended ORO.30 accordingly.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
164.	AMC ORO.30.A.2.a(viii)(b)	AFTG	Reword: (b) self-authorisation should only occur when another suitable FLTAUTHO is not available and, regardless of the reason for doing so, the default position should always be to obtain independent Flight Authorisation whenever practicable.	Regardless of the reason for doing so, is the parenthetical phrase, and 'and' needed before the comma to link '...FLTAUTHO is not available' to 'the default position ...'?	DASA amended ORO.30 accordingly.
165.	AMC ORO.30.A.2.a(viii)(c)	AFTG	Capitalise flight crew		DASA amended ORO.30 accordingly.
166.	AMC ORO.30.A.2.a(ix)	AFTG	Lowercase Non-unit Personnel		DASA amended ORO.30 accordingly.
167.	AMC ORO30.A.2.a(viii)	AFTG	Reword: <i>All flights should be authorised by a unit-based FLTAUTHO whenever possible. The MAO-AM should define in OIP the circumstances under which authorisations by non-unit personnel may be performed.</i>	The last sentence 'Whenever possible ...' should be the first sentence of this paragraph – ie rearranged into an active sentence. Replaces 'MAO' with 'MAO-AM'.	DASA amended ORO.30 accordingly. LSN 69 refers.
168.	AMC ORO30.A.2.a(x)	HQAC	<u>Suggested change:</u> Requirements for Flight Authorisation by Non-executive Flying Instructors. COs of flying The Flight Authorisation Approving Authority in flying training units may delegate Flight Authorisation of solo and mutual flights by student trainee pilots to approved flying instructors, under the following minimum restrictions:	Be consistent in terminology regarding 'Flight Authorisation Approval Authority'. Trainee is the preferred terminology rather than student.	DASA amended ORO.30 accordingly.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
169.	AMC ORO30.A.2.a(x)	AFTG	Move requirements for flying instructors to follow after AMC ORO30.A.2.a(vii)	AMC ORO30.A.2.a(vii) is about FLTAUTHO appointments lower than the designated flying supervisor level, and the description of delegations to flying instructors is directly related to that content.	DASA amended ORO.30 accordingly.
170.	AMC ORO.30.A.2.a(x)	AFTG	Lower case Non-executive	ADF Writing Manual	DASA amended ORO.30 accordingly.
171.	AMC ORO30.A.2.a(x)	AFTG	Reword the authorising sentence as follows: <i>The Flight Authorisation Approving Authority in a training unit may delegate Flight Authorisation for flights by trainee pilots as Aircraft Captain to approved flying instructors, under the following minimum restrictions:</i>	GM ORO.30.A.2 and AMC ORO.30.A.2 cite Flight Authorisation Approval Authority not 'CO'. Trainee vice student	DASA amended ORO.30 accordingly.
172.	AMC ORO30.A.2.a(Viii)b(iii)	AFTG	Do we need to make the distinction between generic Flying Supervisor training and unit equivalent training? Both are flying supervisor training. Need to prescribe a specific Flying Supervision course; otherwise how can unit equivalence be determined?		DASA removed the reference to 'unit equivalent training'. LSN Gen3 refers.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
173.	AMC ORO.30.A.2.a.xi.	HQAC	<u>Suggested change:</u> Flight-Crew Disclosure Requirements. Flight crews Crew should advise the FLTAUTHO, or Aircraft Captain or other senior crew members , of anything that may affect a particular member's medical or psychological fitness, or technical mastery to perform flying related duties.	Recommend replace 'Flight Crew' with simply 'Crew'. The use of Flight Crew excludes non-essential Crew members whom may present possible human factor issues that may impact flying-related duties. There is no explicit obligation on senior crew members to report anything disclosed to them. Simply require any disclosure to the FLTAUTHO or Aircraft Captain.	DASA replaced 'Flight Crew' with 'Crew'. However, DASA retained reference to 'senior Crew members' in this clause of AMC. Rationale: In large crews, it may be appropriate for a junior Crew member to first report such disclosures to a senior Crew member. It may be appropriate for this senior Crew member to apply judgement as to whether the junior Crew member's report meets the threshold for reporting to the Aircraft Captain or FLTAUTHO.
174.	AMC ORO.30.A.2.a.xi)	AFTG	Lowercase Disclosure Requirements		DASA amended ORO.30 accordingly.
175.	AMC ORO.30.A.2.a.xi)	AFTG	Capitalise crews; crew		DASA amended ORO.30 accordingly.
176.	AMC ORO.30.A.2.a.xii(a)(iii)	HQAC	<u>Comment:</u> '(iii) Low Flying Operations. All low flying/ <u>terrain flight</u> operations require specific Flight Authorisation, ensuring:	What are terrain flight operations?	DASA amended ORO.30 to remove the oblique consistent with ADFWM requirements. IAW GPA GEN 2.2 'Terrain flight' is flight below 200FT AHO for day and NVD flights. Terrain flight includes any or all of the following techniques aimed at using terrain or vegetation to cover the movement of the aircraft for tactical purposes: a. Low Level Flight. Low level flight is conducted at a generally constant altitude and airspeed. b. Contour Flight. Contour flight conforms generally to the contours of the earth. It is characterized by generally constant airspeed and varying altitude to achieve generally constant obstacle clearance. c. NOE (Nap of the Earth) Flight. NOE flight is conducted at varying airspeeds and altitudes close to terrain or obstacles.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
177.	AMC ORO.30.A.2.a.xii.a.iii.B	HQAC	<u>Comment:</u> flights are planned to avoid <u>populated areas</u> and operating mines, quarries or other industrial centres	What is defined as a populated area? Does this mean whilst avoiding 'populated areas' the flight must be conducted within a 'sparsely populated area'?	DASA amended ORO.30 AMC as follows: <i>Flights should be planned to remain over Sparsely Populated Areas and to avoid operating mines, quarries or other industrial centres.</i> Rationale: Sparsely Populated Areas is a defined term. For most low flying operations it is appropriate and defensible to remain over Sparsely Populated Areas. The use of the term 'should' allows for the case where there is a compelling operational imperative to operate in the vicinity of cities, towns or settlements.
178.	AMC ORO.30.A.2.a.xii.(a-c)	HQAC	<u>Suggested reordering and simplifying of the subparagraphs:</u> (a) Conducting a Suitability for Flight Assessment. (b) Additional considerations for flights of a more hazardous nature. (c) Conducting a Flight Authorisation Briefing.	1) These subparagraphs are difficult to follow in the manner they are listed. Recommend removing the duplication with other regulations (eg AIRCREW.10, SPA.05, SPA.20, SPA.30, ACD etc). 2) The requirements of the AUTHO should be listed in a logical manner ie basic requirements of the suitability of flight assessment, then additional considerations for flights. 3) Suggest grouping the following as one list rather than separate items with the similar requirements: Specific authorisation limitations may be required for: - Operational missions (what does operational mean?) - Flight Crew Training - Flight Tests - Dangerous Cargo - Display Flying and Flypasts	1) DASA reordered the sub-paragraphs as recommended. While it may appear that ORO.30 includes similar requirements to that of AIRCREW.10, SPA.05, SPA.20, SPA.30, ACD, these requirements are included in ORO.30 as obligations on the FLTAUTHO. 2) DASA reordered the sub-paragraphs as recommended. 3) DASA created a stem sentence containing the common requirements for authorisation of: - Operational missions - Flight Crew Training - Flight Tests - Dangerous Cargo - Display Flying 'Operational' in this context refers to Missions conducted as tasked by CJOPS.
179.	AMC ORO.30.A.2.a(xii)(a)(ii)	AFTG	Lowercase Outside the Aircraft		DASA amended ORO.30 accordingly.
180.	AMC ORO.30.A.2.a(xii)(a)(ii)	AFTG	Replace Aircraft's with Aircraft	Aircraft's is possessive and the aircraft does not own the CRE. Note separate comment to use lowercase Aircraft.	DASA amended ORO.30 accordingly.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
181.	AMC ORO30.A.2.a(xii)(a)(ii)	AFTG	Replace with documented, defined or described, which are appropriate verbs.	'Captured' is the wrong verb.	DASA amended ORO.30 accordingly.
182.	AMC ORO.30.A.2.a.xii(a)(iii)	AFTG	Lowercase 'Operations'		DASA has not incorporated. 'Operation' is a defined term and in this context its capitalisation is appropriate.
183.	AMC ORO.30.A.2.a.xii(a)(iii)	AFTG	Replace 'flying/terrain' with 'flying and terrain'	Must not use an oblique to replace a conjunction, ADF Writing Manual and Australian Government Style Manual refer	DASA amended ORO.30 accordingly.
184.	AMC ORO.30.A.2.a.xii.a.iii.D	HQAC	<u>Suggested change:</u> flight crew are aware of: 1. the obstacle height and lateral separation limitations as well as obstacles and other known hazards 2. their aircraft's performance and capability in relation to the likely ground and air hazards 3. known sensitive areas or other airspace concerns	Poorly worded and difficult to understand the exact intent. Is it the height of the obstacles, or the heights and distances by which to avoid everything, and also to ensure that aware of obstacles and hazards? Suggest that it be rewritten, possibly as sub-paragraphs.	DASA introduced additional sub-paragraphs to enhance the clarity of the original wording. Rationale: It is important for the FLTAUTHO to independently assure that the aircraft Captain is aware of: a. Height and lateral separation limitations (eg a sortie profile may involve flight a surveyed LFR, through a surveyed LFA, and a proportion in which Low Flying is not authorised. Each of these portions of the sortie profile will have different height and lateral separation limitations. It is important that the Crew have a clear understanding of which limitations apply to which portions of the sortie profile). b. Obstacles. It is important that the Crew are aware of the physical obstacles which they may encounter on their flight path. c. Hazards. It is important that the Crew are aware of other the Hazards related to the flight path (eg low level wind shear associated with flight close to terrain, which may not be directly associated with obstacles).
185.	AMC ORO.30.A.2.a.xii(a)(iii)(D)	AFTG	Capitalise flight crew		DASA amended ORO.30 accordingly.
186.	AMC ORO.30.A.2.a.xii(a)(iv)	AFTG	Lowercase Training		DASA amended ORO.30 accordingly.
187.	AMC ORO.30.A.2.a.xii(a)(iv)	AFTG	Capitalise flight crew		DASA amended ORO.30 accordingly.
188.	AMC ORO.30.A.2.a.xii(a)(vi)	AFTG	Capitalise Flight Test.		DASA amended ORO.30 accordingly.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
189.	AMC ORO.30.A.2.a.xii(a)(vi)	AFTG	Replace 'flight tests' with 'Flight Tests'.		DASA amended ORO.30 accordingly.
190.	AMC ORO.30.A.2.a.xii(a)(vii)	AFTG	Lowercase Cargo		DASA amended ORO.30 accordingly.
191.	AMC ORO.30.A.2.a.xii(a)(viii)	AFTG	Reword: Flying Display. Specific authorisation limitations may be required for a Flying Display.	'Flying Display' is defined in DASR	DASA amended ORO.30 accordingly
192.	AMC ORO.30.A.2.a.xii(b)	AFTG	Lowercase Assessment		DASA amended ORO.30 accordingly
193.	AMC ORO.30.A.2.a.xii(b)(i)	HQAC	<u>Suggested change:</u> Individual FLTAUTHO Suitability Assessment. The FLTAUTHO is to conduct a self-assessment to ensure that they are appropriate to authorise the flight Mission .	Use of the word 'flight'. This is the first(?) time that we come across the use of the word flight in the possible context of the reason behind needing a definition; but it isn't capitalised. So does that mean that it isn't per the definition? Mission would be a better definition to reference here.	DASA capitalised 'Flight'. LSN 7 relates.
194.	AMC ORO.30.A.2.a.xii(b)(i)	AFTG	Lowercase Suitability Assessment		DASA amended ORO.30 accordingly.
195.	AMC ORO.30.A.2.a.xii(b)(i)	AFTG	Replace 'they are' with 'the FLTAUTHO is'		DASA amended ORO.30 accordingly.
196.	AMC ORO.30.A.2.a.xii(b)(ii)	AFTG	Lowercase Flight Safety Risks		DASA amended ORO.30 accordingly.
197.	AMC ORO30.A.2.a(xii)(b)(ii)	AFTG	Replace 'SOIU's' with 'SOIU'.	SOIU's is possessive and the CRE does not belong to the SOIU.	DASA amended ORO.30 accordingly.
198.	AMC ORO.30.A.2.a.xii(b)(iii)	AFTG	Lowercase Medical Fitness to Fly		DASA amended ORO.30 accordingly.
199.	AMC ORO.30.A.2.a.xii(b)(iii)	AFTG	Replace 'Aircraft Captain's and the crew's' with 'the Crew's'.	Improves readability and the Aircraft Captain does not need to be separated out from the Crew.	DASA amended ORO.30 accordingly.
200.	AMC ORO30.A.2.a(xii)(b)(iii)(A)	AFTG	Reword: Temporary Medical Unfitness for Flying (TMUFF) considerations	TMUFF is a DASR definition and it already scopes the 'related duties' clause, hence it is redundant and its removal improves readability.	DASA amended ORO.30 accordingly.
201.	AMC ORO.30.A.2.a.xii(b)(iii)(C)	AFTG	Capitalise crew		DASA amended ORO.30 accordingly.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
202.	AMC ORO.30.A.2.a.xii(b)(iv)	AFTG	Lowercase Trained, Competent and Current		DASA amended ORO.30 accordingly.
203.	AMC ORO.30.A.2.a.xii(b)(iv)	AFTG	Replace 'The Aircraft Captain and crew authorised' with 'The Crew authorised'	Simplifying. The Aircraft Captain and Crew do not need to be separately identified. Capitalise Crew	DASA amended ORO.30 accordingly.
204.	AMC ORO.30.A.2.a.xii(b)(v)	AFTG	Lowercase Prepared; capitalise crew		DASA amended ORO.30 accordingly.
205.	AMC ORO.30.A.2.a.xii(b)(v)	AFTG	Replace 'and/or' with 'and'	<p>The FLTAUTHO is to conduct a review of crew preparation for the planned flight, ensuring the crew have received, or will receive, adequate instructions, information and/or and tasking details to complete the flight safely and effectively.</p> <p>The term 'and/or', although provided as an example in the ADF Writing Manual for use of an oblique, is ambiguous and is specifically proscribed in the Australian Government Style Manual. Further, the combination options of 'information and tasking', and 'information or tasking', is not necessary. Information and tasking is satisfactory.</p>	DASA amended ORO.30 accordingly.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
206.	AMC ORO.30.A.2.a.xii(b)(vii)	SRG	<p>We question as to whether take off performance oversight should be within the remit of the FLTAUTHO.</p> <p>Suggest removing take off/landing performance consideration and allow review of Aircraft Captain considerations. eg. Aircraft Captain's Flight Planning Process. The FLTAUTHO is to conduct a review of the Aircraft Captain's flight planning considerations.</p>	<ul style="list-style-type: none"> • The RAAF are operating increasingly complex aircraft to tighter performance margins which has negatively impacted crew workload. • RAAF aircrew do not receive the same level of pre-flight performance support in comparison to the airlines. • Please refer to P-8A Pre-flight Task Comparison – SME Advice (BP10250108), which articulates this issue and was the catalyst for the creation of a dedicated contracted P8 (and later E7) Performance Engineer position. • Additionally, 42 and 92WG are heavily reliant on mission crew FLTAUTHOs due to the nature of operations. Due to the fact these members are not pilot qualified, they do not have the requisite training to satisfy the FLTAUTHO direction in this NPA. • There needs to be improved awareness from the Wing perspective of the flight planning considerations that may have contributed to references C-D. However, directing that responsibility to the FLTAUTHO is misplaced and may detract from wider oversight of the operations they are authorising. 	<p>It is appropriate for the FLTAUTHO to ensure the Aircraft Captain has adequately considered Aircraft performance.</p> <p>DASA provided additional guidance at GM3 ORO.30(a)3 including for the case where the FLTAUTHO is not a pilot.</p> <p>LSN Gen6 refers.</p>
207.	AMC ORO.30.A.2.a.xii(b)(vii)	AFTG	Lowercase Process		DASA amended ORO.30 accordingly.
208.	AMC ORO.30.A.2.a.xii(b)(vii)	AFTG	Capitalise flight planning		DASA amended ORO.30 accordingly.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
209.	AMC ORO.30.A.2.a.xiii.	HQAC	<u>Suggested addition:</u> Conducting Flight Monitoring. The minimum requirement for the monitoring of the flight post-Flight-Authorisation includes: (a) that the FLTAUTHO (or other suitable person) maintains oversight of the flight until its completion (b) that the Aircraft Captain is to inform the FLTAUTHO of deviations from the bounds of the Flight Authorisation as soon as practicable. (c) that the Aircraft Captain ensures the completion of post-flight reporting requirements in accordance with the Flight Authorisation.	1) There should be a definition for what the completion of flight means, ie when does flight monitoring end. 2) Recommend the completion of post-flight reporting requirements should define the end of FLTAUTHO flight monitoring requirements. 3) Within sub-para (a), flight is lowercase. If Flight was defined for a reason, why has it not been used within this para? 4) Replacement of 'flight' with 'Mission' would also work here.	1) LSN 11 refers. 2) The monitoring obligation on the FLTAUTHO ends at the completion of Flight. LSN 11 refers. There is no aviation safety hazard to address by extending the monitoring obligation on the FLTAUTHO to the point of completion of the post-flight reporting requirements in the FLTAUTH record. 3) DASA capitalised 'Flight'. 4) LSN 7 refers.
210.	AMC ORO.30.A.2.a.xiii	AFTG	Lowercase Flight Monitoring		DASA amended ORO.30 accordingly.
211.	AMC ORO30.A.2.a(xiii)	AFTG	Replace ' post-Flight-Authorisation' with 'after Flight Authorisation'.	Simplified reading	DASA amended ORO.30 accordingly.
212.	AMC ORO30.A.2.a(xiii)(a) or other suitable person	AFTG	Remove the parenthesis around 'other suitable person' as it is incorrectly set the clause apart from the text.		DASA amended ORO.30 accordingly.
213.	AMC ORO.30.A.2.a.xiv	AFTG	Lowercase Record Requirements; Record (after Flight Authorisation)		DASA amended ORO.30 accordingly.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
214.	AMC ORO30.A.2.a(xiv)(a) MAO	AFTG	Replace 'MAO' with 'MAO-AM'.		<p>DASR ORO.30 has been amended to reflect 'MAO' as far as each context allows. This provides the organisation the flexibility to issue OIP at any organisational level (ie unit-level), not exclusively at FEG-level by the MAO-AM.</p> <p>For example, where there is a requirement on an individual 'AM' to provide or ensure something, MAO-AM has been retained. Conversely, where the regulation refers more broadly to the organisation providing OIP, the term 'MAO' has been used.</p> <p>LSNs 5 and 69 refer.</p>
215.	AMC ORO30.A.2(a)(xiv)(b)(iv)	AFTG	Replace pilot(s) with 'pilots'	<p>Parenthetic pluralisation is poor English.</p> <p>Per the GM to DASR AO.GEN (under which ORO are defined) <i>GM AO.GEN.00 – Regulation Rules of Interpretation (AUS)</i></p> <p><i>Within DASR Air Operations and DASR Operations Personnel, unless the context states otherwise:</i></p> <ul style="list-style-type: none"> - words importing the singular include the plural - words importing the plural include the singular - words importing the masculine gender include the feminine. 	DASA amended ORO.30 accordingly.
216.	AMC ORO30.A.2(a)(xiv)(b)(v)	AFTG	Reword: 'crew and specified passengers not recorded in a passenger manifest, if applicable'	<p>PAX is not a known DASR abbreviation. Recasting the sentence simplifies reading</p>	DASA amended ORO.30 accordingly.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
217.	AMC ORO30.A.2(a)(xiv)(b)(vii)	AFTG	Reword: sufficient summarised evidence to detail the Flight Authorisation, which may include coded mission descriptors if those missions are defined in OIP (eg 'BGF01' meaning Basic General Flying 1 where BGF1 is defined in the relevant course curriculum and the flight will conform to the Mission documented therein)	Original text: '...sufficient summarised evidence to detail the Flight Authorisation (which may include coded mission descriptors if those missions are defined in OIP, eg 'GF01 IAW Basic PLT Course LMP'—for the case where GF01 is defined in that LMP)...' Use of 'IAW Basic PLT Course LMP' is redundant as the curriculum relates to the unit approved to deliver the training. Criteria omits the requirement that the mission must conform to the coded mission profile. The text in parenthesis should be included in a footnote and not always visible.	DASA amended ORO.30 accordingly.
218.	AMC ORO.30.A.2.a.xiv(c)	AFTG	Lowercase Record Retention		DASA amended ORO.30 accordingly.
219.	AMC ORO.30.A.2.a.xiv(c)	AFTG	Italicise Archives Act 1983		DASA amended ORO.30 accordingly.
220.	AMC ORO.30.A.2(i)b	AFTG	Replace 'flight authorising' with 'Flight Authorisation'.	DASR term	DASA amended ORO.30 accordingly.
221.	AMC ORO.30.A.2(i)b	AFTG	Replace 'Flight Authorisation Officer' with 'FLTAUTHO'	Using an already defined acronym and solves use of 'officer'	LSN 94 relates.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
222.	AMC ORO.30.A.2.(ii)b	HQAC	<u>Suggest deletion:</u> a. ADF Currency Flying Scheme (ACFS) participants may not have previously held a flight authorising appointment, or have access to an appropriate Flight Authorisation Officer. Therefore, in the absence of Command direction, in addition to any civil requirements ACFS participants must 'self-authorise' in accordance with the AMC to this regulation.	There is no need for this as an AMC. If anything, the first sentence is more like GM.	DASA retained the AMC, but amended it to call out the requirements of AMC ORO.30(a)3(ii)a as the acceptable means of self-authorisation for ACFS participants, not subject to alternate Sponsor direction.
223.	AMC ORO30(a)2c GM ORO.30(a)2c	AFTG	Reword opening sentence 'MAO-AMs are accountable for ensuring that flying supervisors apply real-time assessment ...'	The DASR definition for a MAO is: Military Air Operator (MAO) * The regulated organisation approved by the Defence Aviation Authority to perform military air operations as defined in the issued Military Air Operator Certificate (MAOC) and in accordance with DASR. In Defence, a MAO is usually a Force Element Group (FEG) or equivalent. Substituting 'MAO' for 'FEG' would read: FEGs are responsible for making real time ... which does not make sense. DASR, as is WHS regulation, is about ensuring responsibilities and accountabilities are clearly defined. Hence it is the MAO-AM who is responsible. However, a MAO-AM is not going to be responsible for real-time assessments. Thus, MAO-AMs are accountable.	DASR ORO.30 has been amended to reflect 'MAO' as far as each context allows. This provides the organisation the flexibility to issue OIP at any organisational level (ie unit-level), not exclusively at FEG-level by the MAO-AM. For example, where there is a requirement on an individual 'AM' to provide or ensure something, MAO-AM has been retained. Conversely, where the regulation refers more broadly to the organisation providing OIP, the term 'MAO' has been used. LSNs 5 and 69 refer.
224.	AMC ORO30.A.2.c	AFTG	Capitalise flight crew		DASA amended ORO.30 accordingly.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
225.	GM ORO30.A.2.c	AFTG	What is meant by 'within a planned environment'? Is it perhaps now 'IAW Flight Planning'?		<p>In this context 'within a planned environment' refers to the environment in which the Crew is authorised to operate. The characteristics of this environment may include daylight, weather, terrain, airfield status, airspace status and traffic. The authorisation to operate in this environment may be based on inputs such as almanacs, forecasts, maps, NOTAMs, and base and unit flying programmes. Hence the 'planned environment' is the environment the FLTAUTHO expected and considered appropriate for the Flight in question.</p> <p>For example, the 'planned environment' for an authorisation of a trainee's first solo flight would likely include such characteristics as daylight, benign weather, constrained to within the circuit area, on a functional airfield with active ATC and a duty instructor, and with traffic less than a saturated circuit. Should the trainee experience a significant change to the characteristics of this environment, that trainee should consider they are no longer operating in the 'planned environment'—and they should either terminate the sortie or report the divergence from their FLTAUTH as soon as practicable.</p>
226.	AMC ORO.30.A.3	AFTG	Lowercase Management Risk Controls		DASA amended ORO.30 accordingly.
227.	AMC ORO.30.A.3.b	AFTG	Should this be: 'a. The minimum Flying Supervision ...' not b.	There is no 'AMC ORO.30.A.3.a'	DASA amended ORO.30 accordingly.
228.	AMC ORO.30.A.3.b.i	AFTG	Lowercase Levels and Qualification		DASA amended ORO.30 accordingly.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
229.	AMC ORO.30.A.3.b.i	AFTG	Is it 'Crew' or 'Flight Crew' with which the Flying Supervision Risk controls are concerned?	<p>Crew *</p> <p>Competent and authorised individuals, including personnel authorised to undertake aircraft type qualification training, who may operate or interface with an aircraft's systems during flight specific aviation mission, including temporary equipment installations. Crew is broken into subsets of flight crew and mission crew.</p> <p>Flight Crew *</p> <p>Crew, including personnel authorised to undertake aircraft type qualification training, who are charged with duties essential to the safe operation of an aircraft, including remotely piloted aircraft. Flight crew is a subset of crew.</p>	DASA retained 'Crew'. 'Crew' is a broader term which encompasses both Mission Crew and Flight Crew (DASR Glossary refers). Flying supervision therefore applies to both groups.
230.	AMC ORO.30.A.3.b.i	AFTG	Replace 'MAO' with 'MAO-AM'		<p>DASR ORO.30 has been amended to reflect 'MAO' as far as each context allows. This provides the organisation the flexibility to issue OIP at any organisational level (ie unit-level), not exclusively at FEG-level by the MAO-AM.</p> <p>For example, where there is a requirement on an individual 'AM' to provide or ensure something, MAO-AM has been retained. Conversely, where the regulation refers more broadly to the organisation providing OIP, the term 'MAO' has been used.</p> <p>LSNs 5 and 69 refer.</p>
231.	AMC ORO.30.A.3.b.i	AFTG	Capitalise flight crew, mission		DASA amended ORO.30 accordingly.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
232.	AMC ORO.30.A.3.b.ii.	HQAC	<u>Suggested change:</u> Assigning Flight Crew to Tasks. Flying Supervisors should assign Aircraft Captains and crews an Aircraft Captain and crew to particular tasks each task based on the supervisor's assessment of the nature of the task, the potential risk, and the suitability of the individuals. Flying Supervisors...	Improved wording providing specific direction rather than using plurals which confuse the meaning. What was the point of defining Flight and Mission if this paragraph is now using the undefined term task (although included in the Mission definition)?	DASA amended ORO.30 accordingly. DASA defined Flight and Mission to distinguish between aviation safety risks (which are controlled through DASA) and Mission risks (which the Flying Supervisor would also be concerned with). LSN 10 refers. 'Task' is used in this AMC, which deals with assigning Flight Crew to 'tasks' as tasks are a subset of 'Mission' and it may be appropriate to assign Flight Crew to different tasks within a Mission.
233.	AMC ORO.30.A.3.b.ii	AFTG	Lowercase Tasks, Supervisors		DASA amended ORO.30 accordingly.
234.	AMC ORO.30.A.3.b.ii	AFTG	Capitalise crews, crew, flight crew		DASA amended ORO.30 accordingly.
235.	AMC ORO.30.A.3.a.ii	AFTG	Reword the explanatory text for footnote 4 in parenthesis: <i>Cognisant of the requirement to develop Crew experience, additional supervising Crew members may be utilised to assure Suitability For Flight whilst developing junior Crew).</i>	Context switches from 'flight crew' to 'crew', when the scope is to the broader 'crew' concept throughout.	DASA amended ORO.30 accordingly.
236.	AMC ORO.30.A.3.b.ii	AFTG	Replace 'task/mission' with 'task or Mission'	Must not use an oblique to replace a conjunction - ADF Writing Manual.	DASA amended ORO.30 accordingly.
237.	AMC ORO.30.A.3.b.iii	AFTG	Lowercase Management		DASA amended ORO.30 accordingly.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
238.	AMC ORO.30.A.3.b.iii	AFTG	Replace MAO with MAO-AM		<p>DASR ORO.30 has been amended to reflect 'MAO' as far as each context allows. This provides the organisation the flexibility to issue OIP at any organisational level (ie unit-level), not exclusively at FEG-level by the MAO-AM.</p> <p>For example, where there is a requirement on an individual 'AM' to provide or ensure something, MAO-AM has been retained. Conversely, where the regulation refers more broadly to the organisation providing OIP, the term 'MAO' has been used.</p> <p>LSN 5 refers.</p>
239.	AMC ORO.30.A.3.b.iii	AFTG	Replace 'flights/profiles' with 'flights and profiles'	Must not use an oblique to replace a conjunction - ADF Writing Manual.	DASA amended ORO.30 accordingly.
240.	ORO.30(a)2(ii)a&b	DPEPS	Remove IR references to AMC.	Reference to AMC within IR would be unusual. If AMC is mandatory, elevate to IR. If not (i.e. AltMoC may be acceptable), suggest simply placing relevant AMC against sub-clause to promote visibility.	DASA amended ORO.30 accordingly.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
241.	ORO.30(b)	DPEPS	Suggest removal.	Under ICAO-based frameworks, an aircraft's registration has no bearing on the oversight of flight operations. What matters is who is operating the aircraft and where. The primary oversighting authority is then the issuer of the AOC under which the aircraft is operated. If the flight is being operated under the MAO's MAOC, then ORO.30(a) should absolutely be applied irrespective of registration because no other authority will be oversighting. If the flight is instead being operated iaw another AOC (e.g. one issued by CASA), most/all ORO requirements are not applicable and it would be unwieldy to apply a derogation/exemption to each one individually. Suggest instead of scoping ORO.30(a) to "Defence aircraft flights", instead limit to flights operated iaw MAOC.	DAVNOPS does not support the suggestion. Operation under DASR.NDR, per se, does not remove the obligation to comply with any other DASR (BR.015 refers). Further, this derogation provides for circumstances such as the case where Defence has temporarily chartered a QANTAS Aircraft in support of Defence operations, using QANTAS pilots. For this scenario, the NAA (CASA) has no equivalent regulation to DASR.ORO.30 (FLTAUTH is a FLTOPS Hazard control which has no equivalent in many other MAAs and NAAs). However, it would also be unlikely that Defence would have a FLTAUTH with appropriate experience to value-add through a FLTAUTH process. Hence, for Defence to overlay an obligation to conduct FLTAUTH on such a temporary charter operation would likely be unwieldy and ineffective. Therefore the derogation is necessary to alleviate nugatory AltMOC applications. Conversely, scoping ORO.30(a) to only flights operating IAW a MAOC does not capture all the intended audience (eg a non-MAO Sponsor of NDRA crewed by Defence personnel is part of the intended audience of this regulation). DASA intends to provide further clarity through scheduled revisions to DASR.BR and DASR.NDR.
242.	ORO.30(b)	DPEPS	If LSN 242 is not adopted: Replace "under a recognised MAA or NAA" with "under the oversight of an MAA or NAA recognised by DASA for scope including Flight Operations" or similar.	Highlight that the recognised authority must be oversighting the activity. Not all MAAs/NAAs recognised by DASA have Flight Ops within scope.	DASA have amended the derogation as follows: <i>By derogation from ORO.30(a), for NDRA Flights that are solely conducted by non-Defence Flight Crew, the requirements of ORO.30(a) do not apply</i> DASA will consider including the intent of this clause as part of a broader review of DASR.NDR and DASR.BR. LSN 241 relates.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
243.	ORO.30(b)	DPEPS	If LSN 242 is not adopted: “By derogation, the MAO is exempt from the requirements” is a tautology.	30(a) is already scoped to “Defence aircraft flights” only, so no exemption or derogation is necessary to cover NDRA. If we do think an exemption or derogation is necessary, suggest choosing one term or the other.	DASA amended ORO.30 as follows: <i>By derogation from ORO.30(a), for NDRA Flights that are solely conducted by non-Defence Flight Crew, the requirements of ORO.30(a) do not apply.</i> LSN 242 relates.
244.	Flying Supervision definition	DPEPS	Supervision is an act or activity rather than a system.	Suggest removing “The system concerned with” from start of definition.	DASA amended ORO.30 accordingly. LSNs 12 and 14-16 relate.
245.	Flight (<i>Reference: CAA 1988</i>)	Army Aviation	Definition of 'flight': The operation of the aircraft from the moment at which the aircraft first moves under its own power for the purpose of taking off for the first sortie covered by the flight authorisation until the moment it comes to rest after being airborne at the completion of the last sortie covered by the flight authorisation.	Note Army SI Glossary ties flight to flight auth. One Army ‘flight’ can equal multiple sorties, under a single flight authorisation That is; we conduct multiple sorties, where we come to rest after being airborne, within one ‘flight’	DASA amended the definition of 'Mission' to include the case of multiple take-offs and landings. The DASA proposed definition of ‘Flight’ complies with the CAA 1988. AMC ORO.30.A xi.(c)(ii)(A) now allows for cases where there are multiple take-offs and landings. Of note, IAW the ADF Glossary, the term 'Sortie' is synonymous with 'Flight'.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
246.	Flying Supervision (Reference: Derived from DASR.ORO.05 and ORO.30)	Army Aviation	Supervision. (Ref Army SI Glossary) Is broken into a. direct supervision (supervisor capable of directly intervening), and b. supervision c. The supervisor is capable of monitoring or observing the performance by direct or in-direct means, and can communicate a requirement to modify an operation, sequence or process that is being conducted by the member(s), in a timely manner.	Supervision has been interwoven into a number of SIs due to the changes in the Flight Auth Reg, in line with a and b (see defn to left). Note we may need another level of supervision in Army SIs to reflect the new Glossary inclusion as it relates to the framework/system, not necessarily individuals such as Tp COMD/AuthO/Sqn COMD etc. I feel that Flying Supervision is done by individuals within a framework, rather than a framework itself. As per below, I think, for Army, this is a function of indirect supervision by the flying supervisor GM ORO.30.A.3 – Flying Supervision Management Risk Controls Flying Supervision ensures that the controls inherent within the FMS are being adhered to on a daily basis at unit level.	DASA notes no change required. Comment is directed to the update of internal HQ AVN COMD Standing Instructions.
247.	ORO.30(a)	Army Aviation	2. Flight Authorisation system risk controls must include the following: (iii). the Flight Authorisation Officer must have gained an initial Type Rating to undertake Flight Authorisation duties on the relevant Type.	From a Command perspective this remains problematic. Whether this is CO 5 AVN Regt or CO 6 AVN with multiple types under Command, or SAA with the authorisation powers for 3 types presently (IAW the provisions of SI (AVN) OPS) this appears to be an onerous requirement that we have already have a potential solution for. Acknowledging the caveats described in sub-para (iv), I suggest that our SI requirement is more robust (detailed briefing and flight, etc. – decision recorded in PEX.)	The derogation at ORO.30(a)3(iv) provides command with flexibility, as follows: <i>The MAO-AM may issue a waiver against the category on Type if the FLTAUTHO holds, or has held, a category on Type for a similar Aircraft, or is assessed to possess the technical mastery required to compensate for the lack of a specific category on Type.</i> The provisions described in SI (AVN) OPS would likely be a defensible basis for a MAO to establish the assessments of Technical Mastery required by this derogation.
248.	ORO.30(a)	Army Aviation	2.(v) – ‘the Flight Authorisation Officer & acft captain must sign the flight auth record before flight’.	PEX does not have the functionality to allow the AC to sign the flight auth record (except for self-auth of course). Verbal auth is covered within the regs. Perhaps this IR can include words that reflect how Army (and probably FAA) flight auth is actually conducted between Autho & AC utilising PEX	DASA amended the IR to replace the term ‘sign’ with ‘certify’ ICW SO1 OPAW (HQ AVNCOMD) and SO1 CAS (HQ-FAA). LSNs 50 and 53 relate.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
249.	GM ORO.30.A.2	Army Aviation	<p>5 GM ORO.30.A.2</p> <p>d. An effective Flight Authorisation system should include controls that ensure:</p> <p>i. FMS controls are in place on flight-by-flight basis</p> <p>ii. a Suitability For Flight assessment is made by a qualified, competent and authorised officer</p> <p>iii. the acceptance of authority for the safe and effective conduct of the aircraft flight by a competent and fit Aircraft Captain.</p> <p>(Although the Aircraft Captain is granted authority, it is expected that the minimum required flight crew to complete the task are also qualified, fit and competent)</p>	<p>WRT the BOLD sections on LHS – are these in conflict? An SFARP assessment is the cornerstone of the DASR definition of Suitability for Flight. Therefore, why does the GM move on to discuss the characteristics of the minimum flight crew? To operate with less than the specified minimum qualified flight crew is addressed in other areas of regulation and is not required here. Further, the statement, if required, should be about optimisation of crew qualification, fitness and competence to support Suitability for Flight (SFARP).</p>	<p>No, the bolded text sections are not in conflict. The statement in parentheses:</p> <p><i>Although the Aircraft Captain is granted authority, it is expected that the minimum required flight crew to complete the task are also qualified, fit and competent.</i></p> <p>is provided to clarify that while the authorisation is provided to the Aircraft Captain, that authorisation is dependent, <i>inter alia</i>, on the minimum required Flight Crew being present, qualified, fit and competent.</p> <p>While elements of ORO.30 contain content to that of other DASR, they are included in DASA ORO.30 to inform the obligations on the FLTAUTHO. ie while for example SPA.20 places certain obligations on the MAO in respect of the conduct of low flying; ORO.30 places obligation on the FLTAUTHO to consider critical controls in the conduct of low flying as a part of the FLTAUTH process.</p> <p>Of note, the footnote refers to ‘the minimum required Flight Crew’ rather than the ‘minimum qualified Flight Crew’. ie this dependent condition speaks to the composition of the Flight Crew (eg a minimum of one pilot for PC-21) rather than the minimum qualification (eg D Cat PC-21 pilot). Hence the question of SFARP is not relevant, this footnote simply refers to the minimum required Flight Crew IAW the relevant AFM.</p>

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
250.	GM ORO.30.A.2	Army Aviation	Flight Authorisation System Risk Controls: e. Flight Authorisation Officer (FLTAUTHO) Suitability Criteria. Effective Flight Authorisation draws heavily on aviation experience, Technical Mastery and proven decision making attributes. (Where Technical Mastery is ‘The combination of an individual’s training, knowledge, experience and skills that ensures their ability to carry out a specific employment function with a high level of competence.’ Reference: AAP 1000-D Air Power Manual). Accordingly, a potential FLTAUTHO candidate requires both time and aviation experience to develop.	The Definition relied upon here is in a subordinate document. It should be placed in the regulation if intended, as it is here, to define the requirement for Flight Auth Officer.	The definition of ‘Technical Mastery’ provided by AAP 1000-D <i>Air Power Manual</i> suits DASA needs, and is included as a footnote the first time that the term is used. LSN 251 refers.

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
251.	GM ORO.30.A.2	Army Aviation	g. The importance of the FLTAUTHO holding a Type Rating is to assure that the FLTAUTHO has Technical Mastery on the applicable aircraft Type.	As per comments above – the concept of Technical Mastery being tied to an aircraft type and is therefore SFARP is a limited view. Is this the culture we want to create from a Regulatory perspective – it is not the only way forward.	<p>DASA has not incorporated this change.</p> <p>Technical Mastery is defined in the AAP 1000-D <i>Air Power Manual</i> as:</p> <p><i>The combination of an individual's training, knowledge, experience and skills that ensures their ability to carry out a specific employment function with a high level of competence.</i></p> <p>Therefore Technical Mastery relevant to the Aircraft Type is an essential enabler of effective Flight Authorisation. In addition to other MAO- specified FLTAUTHO selection criteria, being Type Rated (now 'category on Type') ensures a FLTAUTHO holds appropriate aircraft knowledge and experience that includes, as specified in GM:</p> <ul style="list-style-type: none"> i. <i>demonstrated competency in the Aircraft Type's CRE</i> ii. <i>awareness of the human factors requirements of the Aircraft Type</i> iii. <i>awareness of the particular Aircraft Type 'nuances'.</i> <p>Where it is necessary to appoint a FLTAUTHO without the relevant Type Rating (now 'category on Type'), the derogation at ORO.30(a)3(iv) provides command with the flexibility to do so.</p> <p>LSN 250 refers.</p>

LSN	NPA Reference	Originator	Community Feedback or Suggested Change	Community Feedback Explanation	DASA Response
252.	AMC ORO.30.A.2	Army Aviation	(a) xiii. Conducting Flight Monitoring. The minimum requirement for the monitoring of the flight post-Flight-Authorisation includes: (a) that the FLTAUTHO (or other suitable person) maintains oversight of the flight until its completion.	There is no definition for 'oversight' in the DASR. There are some definitions in ICAO I believe but also note there are some emerging concepts about Risk Based Oversight (RBO) which is being discussed at EASA forums. At a fundamental level is this direct supervision, indirect supervision, a risk based determination of the level of supervision required or a simple check of the post flight declaration? This stands out as it is a phrase in addition to the very specific requirements further listed in the AMC on crew duty, planning considerations, training, currency, preparedness, etc.	DASA added GM as follows: <i>The nature of oversight is context-based and risk dependent. At a school this would likely be fulfilled by virtue of a duty Instructor monitoring both the relevant ATC frequency and Pilot Monitoring Frequency (PMF), positioned either in the vicinity of the control tower, airborne, or at the operations desk. At an ACG SQN, where most sorties launch and recover from the main operating base, this is typically achieved by virtue of a duty pilot manning the PMF. At an AMG or SRG SQN where the range and duration of missions is typically more extensive, this may be achieved by virtue of an operations cell maintaining two-way communication with the Aircraft Captain, or the FLTAUTHO remaining contactable via phone patch.</i> <i>The purpose of such oversight is to support the aircraft captain in maintaining Suitability For Flight. In doing so, the FLTAUTHO or other suitable person should provide unambiguous instructions and guidance to allow the Aircraft Captain to make well-balanced decisions, while avoiding unnecessary interference with the Aircraft Captain's legitimate decision-making responsibilities.</i>
253.	GM ORO.30.A.1	Army Aviation	a. Under DASR.ORO.05, the MAO is required to ensure that Defence registered aircraft OIP is consistent with the aircraft Type's SOIU.	This will drive a specific review of each platform SOIU (now explicit task rather than implied task) – resource bill.	LSNs 71 and 72 refer.