



**DEFENCE AVIATION SAFETY AUTHORITY**

**COMMENT RESPONSE DOCUMENT TO  
NPA 2023-017 – DASR AIR NAVIGATION SERVICE PROVIDER**

## 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 2023-017, 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 2023-017 (*DASR Air Navigation Service Provider (ANSP)*) for regulated community comment on 7 Mar 24. The period for public comment closed on 2 Apr 24. DASA subsequently consulted with each environmental command HQ to ensure the DASA responses to NPA feedback were acceptable.

## ANALYSIS OF COMMENTS

### General

3. DASA received 89 comments in response to NPA 2023-017. The comments are listed in Annex A together with their corresponding DASA responses.

### Environmental command endorsement positions

4. Environmental command HQs provided endorsement to NPA 2023-017 as follows:
- HQAC and HQSRG advised the proposal was acceptable, but would be improved if DASA made the changes detailed in Annex A
  - HQ AVNCOMD and HQFAA accepted the proposal without change.
5. **DASA response.** DASA accepted and incorporated the majority of feedback into the revised regulation. DASA forwarded the revised draft back to each environmental command HQ, and received subsequent endorsement.

### Environmental command resource implications

6. HQFAA, HQ AVNCOMD and HQAC advised that additional resources are not required as a result of NPA 2023-017.

7. **Transition plan.** DASA incorporated a transition plan with the update to *DASR ANSP*. In this plan, DASA will provide a 12 month transition period, commencing on the date of publication of *DASR ANSP*. This transition period will allow the regulated community to make the necessary changes to their management systems. DASA will not enforce compliance with *DASR ANSP*<sup>1</sup> when conducting oversight activity during the transition period. DASA will consider extensions to the transition period on request.

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<sup>1</sup> 25 Jul 24 release

## AUTHORITY

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

**K Titmuss**

WGCDR

Deputy Director

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Defence Aviation Safety Authority

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Sep 24

**Annex:**

- A. NPA 2023-017: *DASR ANSP – Air Navigation Service Provider* – Regulated  
Community Feedback

DASR ANSP Review Comment Response Document (CRD)						
LSN	Feedback Reference: (i.e. Regulation number, paragraph)	Unit	Current DASR Reference:	Unit comment or suggested change	Unit: Further Explanation where provided	DASA Response
1	ANSP.70(a)2	HAC Div	GM ANSP.70.b	Define "operational service"	The term 'operational service' is not defined so there is some ambiguity as to what events may constitute operational service. The guidance material appears to imply that operational service is related to the introduction to service or significant upgrade of a capability, but the AMC makes this less clear by introducing discussion relating to routine maintenance. As a result, it is not clear whether bringing equipment online after minor maintenance or after being offline out-of-hours, for example, would also constitute returning to operational service.	DASA agrees and will include a definition in the GM and amend the wording of the GM and AMC to ensure consistency in meaning.  GM b. <i>Operational service means use of a system in the provision of an Air Navigation Service.</i>
2	AMC ANSP.70	HAC Div		No OIP guidance	There is no guidance to related or overarching OIP for these AMC as is provided in most other AMC throughout the ANSP reg.	DASA disagrees. AMC ANSP.60(c) includes a reference for OIP relevant to technical systems.
3	AMC ANSP.70(a)	HAC Div		Inclusion of operational security	While this AMC, and the regulations more broadly, are concerned about security from an aviation safety perspective, it would be worthwhile to include a statement emphasising the need for operational security. The need to protect ATM data/radar data etc from others can be vital to allow some missions to be conducted safely.	DASA disagrees. The DASR relate to aviation safety assurance. Operational security requirements are managed IAW Defence security policy (OPSEC).
4	AMC ANSP.60(a)c.i.	AFTG A9 SM		I do question the viability of and need for OIP review at least once each year for all of the ANSP's OIP.		DASA agrees. The requirement will be changed to allow review and amendment as necessary.  c. <i>OIP should be reviewed:</i> i. <i>on a regular basis (at least once every three years)</i> ii. <i>after major events (eg organisational structure changes)</i> iii. <i>after technology changes (introduction of new equipment)</i> iv. <i>after changes in safety regulations.</i>
5	AMC ANSP.80(a)iv	Benchmarking with CASR for Technical workforce		The operational role in AMC ANSP.80(a)iv needs to be clarified to ensure inclusion of technical personnel.		DASA agrees and will include reference to technical personnel in the AMC.  iv. <i>define minimum qualification, experience, recency and currency requirements for each operational role, including those involved in the provision of training and checking, and technical personnel.</i>
6	AMC ANSP.10(a)	Benchmarking with CASR for Technical workforce		CASR 171 subpara (5) is addressed at AMC ANSP.10(a) An ANSP should ensure external contributors to the service, used in support of ANSP activities, operate to equivalent standards.		DASA agrees.
7	GM.60.(c)		AMC.60.(c).b.v	GM.60.c could be moved to AMC to provide closer alignment.		DASA agrees and will amend the AMC as suggested.  b. ... v. <i>establish procedures with AIS providers to ensure expeditious communication of relevant information.</i>
8	ANSP	Army SO1 Avn Stds		Acceptable without change		Thank you.

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9	ANSP	Navy SO1 CAS HQ-FAA		Acceptable without change		Thank you.
10	ANSP.10(a)	HQAC		Provide guidance regarding the exclusion or recognition of non-ADF ANSPs that provide Defence ANS. Examples include Air Services Australia providing contracted ATC and various Data Service Providers such as OzRunways and AeroApp distributing Defence Aeronautical Information.	The ADF EFB content managers were provided formal DASA advice that they could not perform the functions of a DSP unless they were ANSP certified, or recognised as such (e.g. via CASR Part 175). The resultant action is that Defence now contacts OzRunways to provide various Defence Aeronautical information (e.g. ADF FLIP).	DASA disagrees. The requirements for contracted services are provided in AMC ANSP.10 a. .
11	AMC ANSP.10(a)	HQAC		Should MAO's be required to ensure external ANSP contributions, used in support of MAO activities operate to equivalent ANSP standards?		This issue is the subject of proposed future activities related to aeronautical data.
12	AMC ANSP.50(a)b.i-iii	HQAC		Recommend AMC content becomes GM as external organisations may not be willing to facilitate active control / direct involvement or provide internal records due commercial in confidence reasons. GM ANSP.50(a)b provides alternative guidance and could be interpreted as AMC.		DASA disagrees. The AMC details a means by which the ANSP-AM may be assured of appropriate quality in the services being contracted. The GM provides guidance on how the AMC may be implemented.
13	AMC ANSP.60(a)c.i	HQAC		c. OIP should be reviewed: i. on a regular basis ( <del>at least once a year</del> )	Similar to AMC AO.GEN.05.D.1.b, the requirement to review <del>all</del> OIP annually is extremely onerous. The Sponsor of each OIP should be able to tailor the review period as appropriate for the document. The practice of reviewing and reissuing some Standing Instructions with a review period of three years should be supported. If a time period is required to be specified, make it a suggested period ( <del>at least once a year</del> : e.g. annually)	See LSN 4.
14	AMC ANSP.60(a)g	HQAC	GM ANSP.60(a)d	This content should be moved to GM. Since this is AMC, does the ANSP require all these included pages for every OIP? Is the ANSP required to submit an AltMOC if they deviate from this AMC and used existing Defence or other ANSP OIP formats?		DASA agrees. The detailed format will be moved to GM.  <b>AMC</b> g. ANSPs should establish policy to: i. manage OIP ii. define the standard format for OIP <b>GM</b> d. A standard format for OIP may include: i. a compliance statement ii. an approval page iii. a structure of manual iv. a list of effective pages v. a record of normal revisions vi. a record of temporary revisions vii. revision highlights viii. a distribution list ix. a table of contents x. chapter numbering xi. paragraph numbering xii. page numbering.

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15	GM ANSP.60(d)b.iv	HQAC		What about Defence aerodromes that are not certified, or other procedures produced for domestic use?		The standard is certified aerodromes. A certified aerodrome is an approved system - that inter alia has processes to manage aviation hazards to TIFP when not visual. Publication of TIFP for other than certified aerodromes is by exception (IAW GR.80 Flexibility Provisions).
16	ANSP.90	HQAC		Is there any similar regulation required for MAO use of services provided by non-certified providers?	Does GM ANSP.90(a)e interact with MAO obligations regarding use of Aeronautical Information? I.e. use of Jeppesen and OzRunways etc?	DASA incorporated the proposed change within DASR ANSP.90 for ANSP only. Proposed requirements for MAOs using data from a DSP requires further investigation to ensure that the proposal is effective in treating the hazard. The Shift A1 includes Aeronautical Information DSP as a planned future body of work.
17	GM ANSP.90(a)e	HQAC		e. Aeronautical Data may be sourced from third party organisations which are not subject to DASR ANSP eg Boeing Digital Solutions (Jeppesen) and OzRunways P/L.	This should be reworded to say what is permissive rather than what is excluded. Although not subject to DASR ANSP, Aeronautical Data be sourced from 'recognised' or 'trusted' third party organisations.	DASA disagrees. The guidance amplifies the need for the DASR requirements.
18	AMC ANSP.10(a)	HQSRG A9 SO1 Quality and Airworthiness		Airservices Australia provide contracted ATS and maintenance to Defence. Guidance is required from DASA on how an ANSP can comply with this requirement.		DASA agrees. Guidance is provided in specific cases in AMC and GM for DASR ANSP.40 .50 and .70.
19	GM ANSP.30(a)c. and d.	HQSRG A9 SO1 Quality and Airworthiness		The guidance for addressing key staff and formal relationships for/with contributors external to the ANSP can be interpreted very broadly. There are many organisations that contribute to the ANSP, either directly or indirectly. Further guidance is needed to better define the scope of this requirement.		DASA disagrees. The guidance makes reference to (sub paragraph c.) "...contribute to the safe operation of an aviation system..." and (sub paragraph d.) "...can influence the quality of services provided".
20	AMC ANSP.50(a)b.	HQSRG A9 SO1 Quality and Airworthiness		This AMC requires external organisations to operate under the ANSP QMS. Clarification is required to confirm if the ANSP can recognise the external organisations own QMS as being suitable for compliance or if an alternate means of compliance would be required.		The AMC does not require that a contractor operate under the ANSP QMS; rather that the ANSP-AM be "satisfied that the actions taken by contractor or tasked organisations meet the standards required by DASR ANSP. "
21	AMC ANSP.60(a)c.i. and c.ii.	HQSRG A9 SO1 Quality and Airworthiness		Currently not all ANSP OIP is reviewed on the 12 month schedule; a 12 month review for all OIP may not be feasible. Additionally, the requirement to review after technology changes will require some clarification on the scope of review required WRT the level of change.		See LSN 4. The requirement for review after technology changes is amplified in the parentheses in sub para c. iii. .

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22	AMC ANSP.60(b)b.	HQSRG A9 SO1 Quality and Airworthiness		It is not understood why the need for fitness for duty requirements is in ANSP.60. Suggest that this may be best placed in either ANSP.30 (appropriately qualified staff) or ANSP.80 (personnel competency)		The AMC reference supports the requirement in ANSP.60(b)5. for the OIP to define "personnel fitness for duty requirements".
23	ANSP.60(b) 2	HQSRG A9 SO1 Quality and Airworthiness		This paragraph can be interpreted as requiring a Defence ANSP to view harmonisation with ICAO as having primacy over complying with national practice. Recommend that this paragraph be amended to indicate that harmonisation with national practice has primacy. This would also achieve harmonisation with ICAO due to CofA notifications to ICAO as a signatory to the Chicago Convention.		DASA agrees and will reword the sub paragraph as suggested.  <i>2. are harmonised with national civil practice and International Civil Aviation Organisation (ICAO) Standards and Recommended Practices so far as is reasonably practicable.</i>
24	AMC ANSP.60(c)a.i.	HQSRG A9 SO1 Quality and Airworthiness		CASR171 para 050 provides exemption to Defence personnel. 171 requirements will be applied where appropriate and effective.		The reference is provided to enable the application as suggested.
25	AMC ANSP.70(a)b,c.	HQSRG A9 SO1 Quality and Airworthiness		Performance monitoring and reporting is a SPO requirement under the product schedule.		DASA understands this requirement. The AMC statement is included to ensure the ANSP reports performance to users of the ANS system. AMC ANSP.70(a)c is amended to provide greater context to AMC ANSP.70(a)b.  <i>c. <b>Equipment underperformance.</b> ANSP must identify and so far as reasonably practicable, rectify the causes of, or causal factors resulting, in underperformance of equipment, systems and installations. ANSP must then identify any hazards to aviation safety associated with the underperformance of equipment, systems and installations—and eliminate or otherwise minimise the associated risk.</i>
26	AMC ANSP.70(a)e.	HQSRG A9 SO1 Quality and Airworthiness		ANSP is reliant on other agencies to provide physical and cyber security.		DASA understands this arrangement. The AMC statement is included to ensure the ANSP ensures such arrangements are suitable to assure overall system safety.
27	AMC ANSP.80(a)ii.	HQSRG A9 SO1 Quality and Airworthiness		This section of the DASR is about Personnel Competency and Licensing, however this AMC paragraph is referring to adequate numbers of personnel. Recommend the a change in wording of 80(a) to include the word 'sufficient' or similar. E.g. "...ANSP must have sufficient personnel that are qualified, competent and authorised...". Alternatively (better solution), ANSP.30 Organisation should hold this AMC. It just seems like the right section for the AM to ensure delivery of the service.		DASA agrees and will incorporate both suggestions.  <i>AMC ANSP.80(a)</i> <i>ii. determine staffing requirements for a service consistent with the defined and reasonable level of demand and ensure sufficient qualified, competent and authorised personnel are provided</i>  <i>AMC ANSP.30(a) a.</i> <i>iii. sufficient appropriately qualified personnel</i>
28	GM ANSP.80(a)c.	HQSRG A9 SO1 Quality and Airworthiness		It has been discussed that this requirement may be elevated to AMC in the final version of these regs. In that case it is highly likely that Defence will be unable to comply.		DASA will retain the reference as GM, noting proposed changes in the CASR and associated MOS.

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29	ANSP.80(b)	HQSRG A9 SO1 Quality and Airworthiness		ICAO Annex 1 does not require state employees to hold an ATC Licence. While SRG do issue licences, IAW ICAO and CASR MOS guidelines, they are not issued until controllers reach a certain level of experience post-training. This means SRG currently deliver ATS with controllers who do not hold licences.		DASA would expect unlicensed personnel would provide and Air Traffic Control service only while under supervision of appropriately licenced controllers.  Additional AMC inserted to clarify.  <i>b. A person must not have responsibility for an air traffic control function to be performed in connection with any air traffic service that it provides unless:</i>  <i>i. the person holds an ATC licence with a rating for the function and an endorsement for the controlled aerodrome for which, or the airspace in relation to which, the person performs the function; or</i> <i>ii. the person performs the function under the supervision of another person who holds an ATC licence with a rating for the function and an endorsement for the controlled aerodrome for which, or the airspace in relation to which, the person performs the function.</i>
30	ANSP.90	HQSRG A9 SO1 Quality and Airworthiness		AIS-AF does not use data provided by DSPs. We source from other ANSPs, and in some cases become the ANSP for the source data (i.e conduct our own validation and verification to our DQRs for use in products). This regulation appears to be more relevant for platform maintenance organisations to ensure their DSPs meet the intended safety/quality requirements for ingest into aircraft systems. Also seems focused on EFB system managers, but they do not hold an ANSP certificate (is there intent here?).		See LSN 16. The intent of ANSP.90 is to provide ANSP a set of requirements to impose on contracted DSP; this in turn informs other non-approved ANSP and DSP the standard to which they should comply.
31		ACG		ACG has reviewed this proposed amendment including discussion with WGCDR Titmuss at DASA and find "the proposal is acceptable without change"		Thank you.
32	AMC ANSP.50(a)b.	CASG SPO		"hence the contracted or tasked organisation is required to work under the quality system of the ANSP". S&CSPO and Industry Partners provide key ANSP.70 and ANSP.80 services on behalf of the ANSP. The S&CSPO QMS is CASG compliant as per CASG QMS certification requirements. Industry are independently certified to ISO9001. Neither 'work under' the ANSP QMS. S&CSPO produce a Services Plan that details how SPO QMS interacts with ANSP QMS.		DASA considers those arrangements comply with the intent of the regulation. The AMC has been reworded (as underlined) to provide additional clarification.  <i>b. Services contracted to an external organisation supporting an ANSP. The ANSP-AM may contract or task an organisation to perform services on behalf of the ANSP—forming an integral part of the ANSP's system. Hence, the contracted or tasked organisation is required to work under the quality system of the ANSP. ...</i>

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33	GM ANSP.60(c)b.	CASG SPO		"ANSP must communicate CNS system availability to affected organisations through an AIS." Should the ANSP, sometimes via S&CSPO, also report issues with CNS system accuracy and integrity to affected organisations.		DASA agrees and will amend the wording of the GM as suggested. (See also <i>Format</i> LSN 12)  <i>b. ANSP must communicate CNS system availability and, where applicable, accuracy and integrity to affected organisations through an AIS.</i>
34	AMC ANSP.70(a)e.iii/iv/v	CASG SPO		These appear to be generic systems engineering requirements but are linked to Security Threats. S&CSPO should be required to ensure/assure these requirements regardless of whether the change has security/cyber impacts.		DASA agrees there are generic engineering requirements. Following discussion with DIA the requirements were moved to AMC ANSP.70(a)d.
35	AMC ANSP.70(a)h.v	CASG SPO		"to validate the system....." The term 'validate' is often used specifically to an operational evaluation of the system to determine whether the system satisfies the operational needs stated in the operational needs statement. Please confirm whether the intent of this regulation is intended to directly encapsulate the designer / maintainer system verification responsibilities, or is it perhaps intended to only capture the ANSP design validation accountabilities, and the ANSP can transfer verification responsibilities to supporting design agencies to support their validation accountabilities?		DASA agrees the current wording may create ambiguity and will reword the sub paragraph to remove ambiguity.  <i>v. include test schedules, with Regression Testing, to ensure the integrity of the system, equipment and installation serviceability before delivery for operational use.</i>
36	AMC ANSP.70(a)i.iv	CASG SPO		"to validate system, equipment or installation serviceability....." The term 'validate' is often used specifically to an operational evaluation of the system to determine whether the system satisfies the operational needs stated in the operational needs statement. Please confirm whether the intent of this regulation is intended to directly encapsulate the designer / maintainer system verification responsibilities, or is it perhaps intended to only capture the ANSP design validation accountabilities, and the ANSP can transfer verification responsibilities to supporting design agencies to support their validation accountabilities?		DASA agrees the current wording may create ambiguity and will reword the sub paragraph to remove ambiguity.  See LSN46.  <i>iv. establish test schedules, that include Regression Testing, to ensure the integrity of the system, equipment and installation serviceability before delivery for operational use.</i>
37	GM ANSP.70.e	CASG SPO		"the ANSP should document and review a summary of test procedures and results." Need clarification as to who this is aimed at? ANSP (OT&E), SPO (Govern and Assure) and/or Industry (DT&E, AT&E)? Noting if this accountability is aimed at the SPO, S&CSPO will need to change its engineering workforce to perform a more active V&V function rather than Industry governance.		The GM specifies the requirement is on the ANSP. The documentation is expected to be part of the safety assurance process prior to accepting the system for return to operational service.  See LSN 46.
38	AMC ANSP.70(a) e (iii & iv & v)	CASG SPO		"retained or enhanced" may not be feasible within MVP/cost/schedule. Accordingly this is aspirational and all design changes will endeavour to achieve this as part of ongoing cyber uplift, but there may be extenuating circumstances preventing the achievement of this requirement.		DASA understands the aspirational nature of the AMC and expects an ANSP would ensure there would be no system change where existing safety levels were not retained.



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39	GM ANSP.70(a) i (ii)	CASG SPO		"complies with the applicable design requirements" may not be feasible within MVP/cost/schedule etc. More emphasis currently on releasing capability earlier, and therefore some design requirements are not satisfied in initial capability releases. Accordingly S&CSPO will often not satisfy this requirement based on operational priorities. Note - There is a process to accept requirements non-conformances.		DASA notes the existence of a process to accept requirements non conformance. DASA expects any such non conformance would from part of the safety assessment prior to accepting a system for return to operational service.
40	AMC ANSP.70(a)e and l	CASG SPO	AMC ANSP.70(a)k	Unsure why 'l - cyber threats' has been separated from 'e - Security Threats'. Would have expected that these requirements are closely related and would be addressed via the same security / cyber program.		Sub paragraph k. (was l.) has been included to provide examples of OIP which should be considered in meeting the cyber threat requirement.
41	AMC ANSP.70(a)	CASG SPO		AMC3 appears to address only security and cyber. Why is this separated from AMC1 ANSP.70(a)e and l. These requirements appear to be very closely related, so unsure of need to separate. Is there a need for specific regulation for the ATM Network, noting Cyber C&A will include all systems and networks within the assigned system boundary to enable connection to the defence DDG (CIOG) network? DDG will undertake their own C&A activities.		DASA considered it necessary to specifically address those requirements for ATM Network functions because of their critical nature.
42	AMC ANSP.80(a)a.iv	CASG SPO		"define minimum qualification, experience, recency and currency requirements for each operational role, including those involved in the provision of training and checking". Please confirm, noting use of the term 'operational role', whether intent of this specific AMC to cover engineering personnel competency or only ANSP operational roles. Also please clarify that the entirety of ANSP.80(a) is applicable to engineering and maintenance competencies and not just ANSP operational roles.		DASA confirms the intent of the AMC is to apply to ANSP operational roles as well as engineering and maintenance roles. DASA intends this requirement to align with the proposed changes to the CASR 171 and associated MOS. Amended to: <i>iv. define minimum qualification, experience, recency and currency requirements for each operational role, including those involved in the provision of training and checking and technical personnel.</i>
43	ANSP.70.(a)	CASG SPO		Previously DASR ANSP.70(a) included the following AMC "2. Software. ANSPs should implement software safety assurance that meets standards acceptable to the Authority" plus explicit GM. This has been removed and replaced by the following GM "The DASDRM details ATM/CNS equipment design standards and includes requirements for software safety assurance." Presume that the intent is to no longer to amplify software assurance above any other CNS standard included in the DASDRM. Please clarify.		DASA confirms the intent is to include software assurance with other CNS standards detailed in the DASDRM.
44	ANSP	DIA		An overall comment relates to the DT review – the proposed approach relied upon a complete solution WRT ANS inclusive of requirements on MAOs. I note that there is no commentary regarding MAO requirements being implemented. Is there an update in work, or a plan to address the gaps left by not implementing the MAO requirements at this time?		DASA was advised to constrain changes to those specific the ANSP to ensure regulatory changes did not impose unacceptable workload on MAOs. Also see LSN 16.

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45	AMC ANSP.60.d.2	DIA	GM ANSP.10(a)	AMC 60.d.2 is missing in section 3. There is no AMC and GM related to the application and attainment of an LOA. To support the community, some AMC and GM could be developed (with DIA) to support the community.		DASA will correct the omission and work with DIA to develop appropriate AMC and GM.  Additional GM added to clarify.  <i>c. A DASA issued Letter of Acceptance (LOA) confirms an organisation has demonstrated compliance to a recognised standard as referenced within ICAO Doc 10066 – Procedures for Air Navigation Services Aeronautical Information Management (PANS-AIM) for processing aeronautical data for a specific database. Complying organisations will have defined data quality requirements, detailed processing procedures, and an established and maintained Quality Management System (QMS) associated with the aeronautical data process. This is aimed to ensure data quality has been maintained throughout all phases of the data handling process. Organisations seeking an LOA are to apply to DASA in writing, declaring that their aeronautical data process for a specific database is compliant to a recognised standard. DASA will issue an LOA when satisfied the applicant organisation has met all the requirements.</i>
46	ANSP.70(a) 2	DIA		70.a.2 is limited to test only. This is insufficient. As a minimum, this should relate to demonstrating and declaring compliance of ATM/ANS equipment with detailed specifications identified within a defined specification / certification basis which reflect recognised good practise design specifications (including Sw). As an example to elaborate, meeting Software Standards is not achieved through test. It is a Design Assurance activity that needs to start very early on in the Software lifecycle). The Requirements AMC and GM related to 70.a.2 and 70.a.3 needs to be reworked in line with establishing the correct design requirements, establishing the correct means of compliance, demonstrating compliance to the design requirements IAW the means of compliance and then declaring compliance to the requirements.	An example of AMC for Declaration may be: An approved organisation shall submit to the Agency a dated and signed declaration of compliance of the design of ATM/ANS equipment. The declaration shall contain at least the following information: a. description of the design, including all the configurations; (b) the rated performance of the equipment, where appropriate, either directly or by reference to other supplementary documents; (c) a statement of compliance certifying that the equipment meets the applicable specifications, and a list of the declaration specifications and special conditions, as applicable; (d) reference to relevant supporting evidence, including test reports; (e) reference to the appropriate operation, set-up and maintenance manuals; (f) the levels of compliance, where various levels of compliance are allowed by the declaration specifications; (g) list of deviations, as applicable.  Means of Compliance are aligned such as	DASA considers the design and other requirements detailed in the comment are requirements separate to the operational safety assurance roles of the ANSP and are covered in separate engineering regulations and procedures. Procedures detailed in GM ANSP.70(a)e. and f. are intended to ensure those procedures are taken to account by the ANSP in their safety assurance role.  DASA will amend the wording to reflect the comprehensive nature of the requirement and provide GM reference to appropriate sources of procedures and processes.  <i>2. are verified and tested to ensure they comply with relevant technical and operational requirements and present no detriment to Aviation Safety and operational capability</i>  <i>GM ANSP.70(a)2. – Initial acceptance and return to service following modification or maintenance</i>  <i>a. Procedures and process for commissioning of new systems and verification and testing of systems following modification or maintenance should be similar to those for aircraft and other aviation systems as detailed in DASR.21.A.20.</i>
47	ANSP.70(a)4.	DIA	ANSP.70(a)3	Is 70.a.4 going to link into DASR Cyber cross regulation? Please discuss with DIA-DTS about whether this can be achieved in the July release?		DASA has held discussions with SQNLDR Myers to ensure there is a process to link the cyber elements of the DASR ANSP with the DASR Cyber. That process will ensure both DASR are modified as they are released to be compatible and complimentary.

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48	AMC ANSP.70(a)	DIA		The AMC for 70.a. talks of Maintenance, however there is no requirement for maintaining the system IAW the approved design and instructions for maintaining compliance of the systems. This should also link into 'certified' maintainers that can and need to be recognised with CASA.		DASA considers the maintenance requirements detailed in the comment are requirements separate to the operational safety assurance roles of the ANSP and are covered in separate engineering regulations and procedures.  Procedures detailed in AMC ANSP.70(a). i. to v., AMC ANSP.70(a)2 c. and AMC ANSP.70(a).d. are intended to ensure those procedures are taken to account by the ANSP in their safety assurance role.  The link to "certified maintainers" that can be recognised by CASA is problematical until the competency based regs in CASR 171 are available and the recognition coordination is undertaken.
49	Definitions	CASA	Aeronautical Data	Annex 15: Aeronautical data. A representation of aeronautical facts, concepts or instructions in a formalized manner suitable for communication, interpretation or processing.		DASA agrees and will amend the definition to harmonises with ICAO Annex 15 as suggested.
50	Definitions	CASA	Meteorological Services	Recommend further review of the definition and explanation within the definition. Suggest the term 'meteorological service provider' is used instead of meteorological services. In the Australian context, this ensures there is distinction between the provider and authority functions of the BOM.  Suggest Met service provider is defined as 'a provider of meteorological information for air navigation' (adapted from ICAO Annex 3).  Further suggest the addition of the ICAO Annex 3 definition for 'Met Information' (meteorological report, analysis, forecast, and any other statement relating to existing or expected meteorological conditions). This would create a context for the first proposed definition.  Annex 3 does not specifically define 'meteorological services' nor have any specific reference to 'weather information services'.		DASA does not intend DASR ANSP to apply to Metrological Service Providers. The definition of Meteorological Services is provide to support use of the term in DASR ANSP.60(b) 3.
51	ANSP.30	CASA		The NPA reference includes 'Key Staff with appropriate experience'. However, there is little explanation or guidance on what are 'Key Staff'. Suggest more granularity in this regard, but specifically recommend that a safety manager is specifically identified as an essential 'key staff' member	Presuming the DASRs are broadly aligned with EASA standards, this would align with the expectation of the latter (see ATM/ANS.OR.B.005(c) - Management system).	GM ANSP.30c. provides clarification. Specific appointments of Key Staff for safety and quality management are referred to in DASR ANSP.20.

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52	ANSP.60(b)3.	CASA		Consider including: v. other ANSPs to cover the interface with Airservices Australia.	Defence ANSPs have airspace boundaries with civil ANSPs which need to be considered in relation to this requirement.	DASA agrees and will include the suggested additional sub paragraph in DASR ANSP.60(b)3..  v. other ANSPs
53	ANSP.70(a)4.	CASA		Does DASA prescribe any standards, in relation to physical and cyber threats, which the ANSP must comply with?	The Department of Home Affairs carries the cyber security portfolio for Australia including civil aviation. Hence the CASRs will refer to Home Affairs legislation rather than carry a lot of details on ATM systems. Is this also the case for Defence?	DASA is preparing a specific regulation related to cyber - DASR CYBER. DASR ANSP will be aligned with DASR CYBER when DASR CYBER is released.
54	AMC ANSP.80(a)iv.	Deputy Director Regulations Licencing and Training		"define minimum qualification, experience, recency and currency requirements for each operational role, including those involved in the provision of training and checking"  I think the term 'operational role' might be confusing and may either need definition or replacement with just 'role'  Is maintenance of ANSP an 'operational role'? – GM to ANSP.80(a) refers to competency of 'technical personnel' so I would assume the answer is yes but in could be clearer		See LSN 42.
55	GM AMSP.80(a)c.	Deputy Director Regulations Licencing and Training		"ANSPs may use CASA, EASA and ICAO standards for technical personnel competency to manage competencies".  • I don't think there are any standards that define the qualifications and experience that personnel maintaining ANSP's are required to have • Australian Civil ANSP devices are managed by Air Services Australia – I would suggest the GM seek defence ANSP providers should align to Air Services Australia requirements when defining the qualifications and experience for personnel maintaining ANSP's (as the nationally accepted standard).		The Airservices requirements are based on current CASR Part 171 requirements for a tertiary education standard. A proposed change to the CASR Part 171 will see greater alignment to ICAO for competency based authorisations. Once that change is implemented, the intent is to align to the CASR and the CASA approved system (employed by Airservices)—to achieve greater workforce efficiencies under OneSKY.
56	GM ANSP.80(a)b	DASA	AMC ANSP.80(a)vi	The imposed requirement needs to be in AMC (not GM) 'ANSPs must include required authorisations or competencies in OIP.'	Include in AMC ANSP.80(a)	DASA Agrees and will move the requirement to AMC:  vi. include required authorisations or competencies in OIP.

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57	GM ANSP.80(b)a	HQ SRG		In the NPA the GM has been amended to appoint the Chief Air Traffic Controller as the DoSA for licencing. If DASA issued formal advice remains extant there is no reason to change the GM and we can modify the wording in the Exposition to indicate that OC 44WG issues the licences on behalf of the DoSA (ANSP AM). A second reason not to change the GM is that the amended version introduces the Chief Air Traffic Controller (CATC) term into the regs for the first time. I'm not entirely sure of why the CATC term was created in the first Exposition but I have always questioned the need for it as the roles can equally be assigned to the OC 44WG/DIR A8 ANSP. Note that the extant licence template signature block is for the OC 44WG on behalf of the ANSP-AM.		DASA issued Formal Advice will be revoked on issue of the revised regulation. DASA agrees to remove the new term CATC and replacing with OC 44WG. GM will include appointment of OC 44WG as the DoSA for ATC licencing.
58	GM ANSP.10(a)	DIA	GM ANSP.10(a)c	GM is required to provide guidance on the requirement for an LOA, and for the issue of an LOA. Suggested GM: <i>A DASA issued Letter of Acceptance (LOA) confirms an organisation has demonstrated compliance to a recognised standard (eg RTCA DO-200B or EUROCAE ED-76A) for processing aeronautical data with regards to a specific database Complying organisations will have defined quality requirements for aeronautical data, detailed processing procedures, and an established and maintained Quality Management System (QMS) associated with the aeronautical data process. This is aimed to ensure data quality has been maintained throughout all phases of the data handling process. Organisations seeking an LOA are to apply to DASA in writing declaring that their aeronautical data</i>		DASA Agrees and will include the wording as suggested.  <i>A DASA issued Letter of Acceptance (LOA) confirms an organisation has demonstrated compliance to a recognised standard (eg RTCA DO-200B or EUROCAE ED-76A) for processing aeronautical data with regards to a specific database Complying organisations will have defined quality requirements for aeronautical data, detailed processing procedures, and an established and maintained Quality Management System (QMS) associated with the aeronautical data process. This is aimed to ensure data quality has been maintained throughout all phases of the data handling process. Organisations seeking an LOA are to apply to DASA in writing, declaring that their aeronautical data process for a specific database is compliant to a recognised standard. DASA will issue an LOA on verification of the organisation's demonstration of compliance with the recognised standard.</i>
59	AMC ANSP.70(a)j.iv.	DASA		editorial change to improve clarity: the requirements is established in the first sentence, making the last sentence redundant.	<i>establish procedures to detect and rectify maintenance errors</i> that could result in a failure, malfunction, or fault endangering the safe operation of the equipment if not performed properly. The procedures should identify the: (a) method for capturing errors, and (b) maintenance tasks or processes	DASA agrees and will amend the AMC:  <i>i. establish procedures to detect and rectify maintenance errors that could result in a failure, malfunction, or fault endangering the safe operation of the equipment if not performed properly</i>

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60	AMC ANSP.70(a)2.d	DIA		new AMC required	AMC is required to detail (a) the requirement for certification basis compliance demonstration and (b) requirements for tailoring from an approved certification basis.	DASA agrees and will include the following in AMC:  a. An ANSP is responsible for demonstrating, through the production of evidence, that the design and construction of the equipment, systems and installations provided, or intended to be provided meet the certification basis. This evidence may consist of reports, drawings, specifications, calculations, analysis etc. b. Partial compliance with the certification basis is not permitted. Where the applicant cannot justify meeting a design requirement in the certification basis, the applicant should pursue approval for tailoring of the certification basis as provided in AMC DASA ANSP.70(a)2.c. c. DASA may approve any tailoring of the above design requirements, on the basis that: i. a safety argument demonstrates an equivalent level of safety that can be achieved through a tailored design requirement, or ii. compliance with the design requirement would adversely affect Defence capability, and risks to aviation safety can be eliminated or otherwise minimised SFARP through alternate means. d. ANSPs must support proposals for tailoring to the certification basis per paragraph c.(ii) with a documented rationale that includes: i. confirmation that Defence has a well-defined capability imperative, and that meeting the prescribed design requirements would impede achievement of that capability imperative ii. a description of the proposed tailoring, including any additional operational procedures that will be employed to eliminate or otherwise minimise risk iii. confirmation that appropriate consultation, cooperation and coordination has been conducted between all persons with a shared duty to ensure health and safety for aerodrome users iv. confirmation that the applicant, with assistance from users, has clearly characterised the risk due to the tailored design requirements v. confirmation that the relevant aircraft Military Air Operator(s) has agreed that risks have been eliminated or otherwise minimised SFARP, and both the ANSP and MAO(s) have agreed to retain any residual risk. e. The applicant should make compliance demonstration evidence available to DASA who
61	NDR.05(d) and AMC	DAVNOPS	NDR.05(c)5 AMC NDR.05(c)5	1. Replace all instances of the term 'Experimental Certificate of Airworthiness' with 'Experimental Certificate'.  2. AMC NDR.05(d) contains a Typo or Grammatical error: 'Defence AA approval may be obtained though consultation with DASA.' 'though' should be 'through'	Updated term and Typo or Grammar	1. DASA amended all instances of 'Experimental Certificate of Airworthiness' to 'Experimental Certificate'.  2. DASA amended AMC NDR.05(f) (now AMC NDR.05(c)5 – Approval To Operate a NDRA (Experimental Certificate) (AUS)), as follows:  'a. DASA must approve any Defence operation of an NDRA to be operated under an Experimental Certificate. b. The MAO-AM or Sponsor should contact DASA to initiate consultation for approval.'
62	AMC NDR.05(c).ii	DFSB	AMC2 NDR.05(d)d.iii.(b)(iii)		<b>From DDSIHF:</b> <i>Might be worth noting that the TSI Act uses a different definition of Defence aircraft: Australian defence aircraft means an aircraft used by the Australian Defence Force but does not include an aircraft that is registered under regulations made under the Civil Aviation Act 1988. NDR aircraft are subject to safety reporting obligations under the TSI Regulations covering mandatory, voluntary and confidential reporting schemes.</i>  [In follow up conversation, DASA established ICW DD SIHF and DASA LO that the principles to guide the development of this AMC should include: - meet legislative obligations - maximise Defence visibility (Ideally through Salus/Sentinel) - minimise duplication of reporting requirements for Defence operators]	ICW DD SIHF (DFSB), DASA added the following to AMC2 NDR.05(d)d.iii.(b)(iii):  <i>Additionally, safety events which meet or exceed the equivalent Defence Aviation Safety Manual Perceived Risk Level of a class C event, should be reported in the Defence aviation safety reporting tool (to include recording, investigation, setting and tracking actions to closure; and the review and analysis of events within required timeframes).</i>  DFSB will separately seek to engage with ATSB with a view to identifying a solution which might minimise duplication in reporting requirements. DFSB will engage with the DASA LO to ensure the Commonwealth information management requirements (including privacy) are considered in developing any solution which invites data sharing between agencies. In particular, to ensure any legislative limitations are addressed within respect to information sharing.

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63	Definitions	HAC Div	Definitions	Several of the terms added to the definitions already have similar, but different, definitions in other aviation documents. These differences in definition, where there is no appreciable need for variation, could result in confusion and misinterpretation. Where variation is essential a way of highlighting that the definition has been changed would be beneficial. Examples include: Aeronautical Data Originator – Defined in CASR 175 Air Traffic Service – defined in ICAO Annex 11		DASA agrees and will add explanations and additional references as necessary.  The CASA definition of Aeronautical Data Originator is too specific for the DASR requirements.
64	Definitions	HAC Div	Definition Air Traffic Control Service	The definition as written makes it sound like all three of an area control, approach control and aerodrome control service are required to make an air traffic control service. It should be either reworded IAW ICAO Annex 11 (remove the last paragraph), or if that paragraph is considered essential, it should be reworded to be an 'or' list or have an lead in of "The Air Traffic Control Service comprises any of ...."		DASA agrees and will reword the last sentence as suggested. <i>A service provided for the purpose of:</i>  <i>(a) preventing collisions</i>  <i>i. between aircraft</i>  <i>ii. between aircraft and obstructions on the manoeuvring area</i>  <i>(b) expediting and maintaining an orderly flow of air traffic.</i>  <i>The Air Traffic Control Service comprises any one or combination of: an area control service, an approach control service and an aerodrome control service.</i>
65	AMC ANSP.20(a).b.i	HAC Div		Use of CDR SRG as the example accountable manager is more appropriate as the ANSP capability is, and will for the foreseeable		DASA agrees and will amend the example as suggested.  <i>i. Accountable Manager (AM) listed by command or management position, eg 'CDR SRG'</i>
66	AMC ANSP.20(a).b.v	HAC Div		The use of procedural ATC service is confusing as it is not a service type, either in the context of the definition of an Air Traffic Control Service (area, approach or aerodrome) or and Air Navigation Service (ATM, MET, AIS etc). If procedural control is a specific type of control service it should be listed in the definition, if not then it is not a relevant example.		DASA disagrees but will delete the example to remove any ambiguity.  <i>c. Specific approvals. An ANSP may request a specific approval for a particular service type, a means of providing a service, location at which services are provided or for all services operated by the ANSP.</i>
67	AMC ANSP.60(a).a.vi	HAC Div	AMC ANSP.60(a).a.vi, vii	There are two unrelated points grouped under this sub-point: new issues, reissues and amendments are made when they have been approved AND that OIP is harmonised with ICAO and civil practice. It does not make sense to group these two points together as they are not sufficiently related.		DASA agrees and will separate the points as suggested.  <i>vi. new issues, reissues, and amendments are made when changes have been approved by a relevant authority</i>  <i>vii. OIP are harmonised with national civil practice and ICAO so far as is reasonably practicable</i>
68	ANSP.60(b).2	HAC Div		Change "must" to "should"	This regulation compels the ANSP to harmonise with ICAO and national practices. While this is obviously highly desirable, it is not always practical or achievable in the Defence context. The guidance material at GM ANSP.60(a).c moderates this to 'should' and applies the caveat 'as far as possible', this GM is at odds with the actual wording of the regulation ('must'). Similarly the guidance material at GM ANSP.60(b) is at odds with the regulation due to the same mismatch	DASA agrees and will amend the wording to achieve the proposed change.  <i>2. are harmonised with national civil and International Civil Aviation Organization (ICAO) so far as is reasonably practicable</i>
69	GM ANSP.60(b).a	HAC Div		Word missing?	There appears to be a word missing. "Defence is committed to CASA to provide to civil aviation an equivalent level _____ to that provided under the CASR". An equivalent level of what? Safety? Service?	DASA agrees and will amend the wording to provide clarity.  <i>a. Defence is committed to CASA to provide to civil aviation an equivalent level of safety to that provided under the CASR (the Subsidiary Agreement for the Transparency of Safety Oversight to the Delivery of Defence Air Traffic Services to Civil Aviation Operations refers). This regulation allows for assurance, and continuing visibility of this commitment to CASA.</i>
70	AMC ANSP.70(a).a	HAC Div	AMC ANSP.70(a)	Confusing phrase	The phrase "when an ANSP contracts or purchases and part of its" does not make sense. Is the 'of' supposed to be 'or'?	DASA agrees and will amend the wording as suggested.  <i>i. Contracted Activities. An ANSP should address all aspects of DASR ANSP.70(a) when an ANSP contracts or purchases any part of its:</i>

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71	ANSP.90(a)	HAC Div		Data Services Provider is not defined	The concept and scope of what constitutes a Data Service Provider is not included in the definitions. While the guidance material goes on to give a definition, it would be better if this was a definition rather than guidance material.	DASA agrees and the definition will be included in the Glossary.
72	Draft ANSP Regulation	AFTG A9 SM	Entire document	Only editorial comment in line with previous NPAs—spelling, punctuation, grammar, paragraph numbering, etc—none of which affects the technical detail.	BP40906832	Except where the suggested amendments are contrary to the Interim Style Guide or change the intent of the regulation, DASA will amend the document as suggested.
73	ANSP.60	HQAC		2. are harmonised with <del>Internal</del> International Civil Aviation Organisation (ICAO) and national civil practice		DASA agrees and will correct the typo.  2. are harmonised with International Civil Aviation Organization (ICAO) and national civil practice so far as is reasonably practicable
74	GM ANSP.60(c)b	HQAC		b. ANSP <del>must</del> should communicate CNS system availability to affected organisations through an AIS. CNS providers should establish procedures with AIS providers to ensure expeditious communication of relevant information.		DASA agrees and will amend the wording as suggested.  b. ANSP should communicate CNS system availability to affected organisations through an AIS. CNS providers should establish procedures with AIS providers to ensure expeditious communication of relevant information.
75	AMC ANSP.70(a)a	HQAC		An ANSP should address all aspects of DASR ANSP.70 (a) when an ANSP contracts <del>of</del> purchases any part of its:		See LSN 70
76	AMC ANSP.70(a)a.i	HQAC		Split this phrase into separate sentences as there are too much use of the word 'and'. There appears to be two parts to this requirement: identification of critical vulnerabilities and implementation of risk assessed measures. Also there is a period missing at the end of the sentence.		DASA disagrees. The identification of attributes of the ATM Network functions is for the purpose of risk assessment.
77	GM ANSP.70d.	HQAC	GM ANSP.70e	d. Reasonable level of demand. <del>A reasonable level of demand would include increases in demand caused by credible scenarios such as power outages, internet outages and weather events. An ANSP must consider credible scenarios in safety analysis and develop the system architecture to provide sufficient capacity and redundancy to ensure continuity of service in these scenarios.</del>  d. Reasonable level of demand. An ANSP should consider credible scenarios, involving a reasonable level of demand, in safety analysis and develop system architecture to provide sufficient capacity and redundancy to ensure continuity. A reasonable level of demand would include increases in demand caused by credible scenarios such as power outages, internet outages and weather events.	Recommend reordering into separate sentences. There should be no 'must' requirements within GM. Replace must with should, or alternatively make it AMC.	DASA partially agrees and will correct the typo and change "must" to "should". DASA does not consider the requirement should be placed in AMC.  d. Reasonable level of demand. An ANSP should develop system architecture to provide sufficient capacity and redundancy to ensure continuity of service in all credible scenarios, as identified through safety analysis. This includes increases in demand caused by credible scenarios such as power outages, internet outages and weather event.
78	AMC ANSP.80(c)a.ii	HQAC		ii. (AUS) CASR Part 173 - Instrument flight procedure design.		DASA agrees and will amend the reference as suggested.  ii. (AUS) CASR Part 173 - Instrument flight procedure design.
79	AMC ANSP.60(a)f. and g.	HQAC		These paras use the term 'policy' where we believe the term 'procedures' may be more appropriate.		DASA disagrees and will retain the extant wording. (Use is aligned with the ADF Glossary.)
80	AMC ANSP.60(b)a.v. and vi.	HQAC		The SRG ANSP does not conduct control from ships and therefore these documents do not form any basis for our OIP. Unless it is intended for DASR.ANSP to be applied to services provided by Navy at sea recommend that these references be removed from the regulations.		DASA understand the scope of services provided by SRG. The reference will remain in the AMC to provide a reference should other ANSPs require information from those documents.
81	ANSP.70(a) AMC (all)	CASG SPO		There is no direct alignment between regulation and AMC for ANSP.70.A. For example ANSP.70(a).4 is implemented in several parts of AMC1 plus AMC3. ANSP.70(a).2 & 3 are embedded in several parts of the wide ranging AMC1. Is this intended and standard practice?		DASA agrees. Following guidance on format for AMC all sections will be included in "AMC".
82	AMC ANSP.70(a)	CASG SPO		"an ANSP contract <del>of</del> purchases"	believe "of" should be "or"	See LSN 70



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83	AMC ANSP.10(a)	DIA		The NPA uses Letter of Approval – LOA is Letter of Acceptance. Also requires correction at – ANSP 60.d.2. ; addition to the acronym list and should consider defining in the Glossary so not required defining in AMC and GM.		DASA agrees and will amend the wording as suggested.  <i>AMC ANSP.10(a)</i> <i>b. An ANSP that provides Aeronautical Information Service (AIS) must also operate IAW the Letter of Acceptance (LOA) issued by DASA.</i>  <i>ANSP.60(d)</i> <i>2. operate IAW the Letter of Acceptance (LOA) issued by DASA.</i>
84	AMC ANSP.30(a)vii.	FLTOPS		'a SMS ..' should be 'an SMS.'		DASA agrees and will amend the wording as suggested.  <i>vii. an SMS IAW DASR ANSP.40</i>
85	AMC ANSP.50(a)b.iii	FLTOPS		para 1. and 2. labelling incorrect, should be para (a) and (b)		DASA agrees and will amend the numbering as suggested.  <i>(a) records (which may include any contracts, inspection documents, and accident reporting and incident reporting requirements)</i>  <i>(b) documentation which may include documents provided to the recognised CAA or MAA, operations manuals, maintenance records, individual competency and currency records, safety occurrence reports and investigation reports.</i>
86	AMC ANSP.70(a)j.iv(b)	FLTOPS		full stop missing after 'processes' (if it is the last para in the list-see next comment)		DASA agrees. However format change at LSN 87 removes requirement for punctuation (IAW DWM)
87	AMC ANSP.70(a)k	FLTOPS	AMC ANSP.70(a)j.v.	'ensure the activities do not impact ANS system safety' this seems out of place as k. Para labelling error? Is it meant to be AMC1 ANSP.70(a)j.iv(c) above it or AMC1 ANSP.70(a)j.v? I suspect the latter j.v. Either way it will need a full stop after '... system safety'		DASA agrees and will amend the formatting, numbering and punctuation as suggested.  <i>v. ensure the activities do not impact ANS system safety.</i>
88	AMC ANSP.10(a)	CASA		Unless "external contributors" has been defined, it is suggested replacing it with the terms used earlier in the document i.e. 'external organisation' or 'contractor' as "external contributor" may be viewed as something different.		DASA agrees and will amend the wording as suggested.  <i>a. An ANSP should ensure external organisations, used in support of ANSP activities, operate to standards equivalent to those with which the ANSP is required to comply.</i>
89	AMC ANSP.10(a)	CASA		For clarity, consider replacing "equivalent standards" with "standards equivalent to those which the ANSP is required to comply with".		DASA agrees and will amend the wording in accordance with the Defence Writing Guide.  <i>a. An ANSP should ensure external organisations, used in support of ANSP activities, operate to standards equivalent to those with which the ANSP is required to comply.</i>