

Submission to: Regulatory requirements that impact on the safe use of Remotely Piloted Aircraft Systems, Unmanned Aerial Systems and associated systems.

## Introduction

Ian Fraser age 56

I have had an interest in photography since an early age. I took an active interest in photography when I could finally afford to buy a decent 35mm SLR from those early days I was able to take photographs that I could potentially market and sell.

I have traveled and taken many photographs over the years and good number of those I now have online for people to buy either as prints or digital copies. I have the freedom to market and sell my intellectual property that I photographed with various ground based cameras. I have paid for helicopter flights and I have photographed landscapes from helicopters again I have the right to market and sell my intellectual property taken from the air using my Cameras.

Let's look at an example of how the rules were and what they could return to.

The GoPro Action camera this is a fairly common camera type used on an RPA. I can use a GoPro on the ground to take photos and video CASA have no control on what I can do with the images and video. Take that same camera and stick on a pole and put it 10m in the air again CASA have no say in what I can do with those images or video. Now put that camera on an RPA and suddenly CASA says I cannot sell my intellectual property (IP) unless I spend many thousands of dollars on a license so that I can sell a few images from my hobby. A hobby that is unrestricted by CASA so long as the Camera is not attached to an RPA.

**The Sub 2kg rules gave me back the rights to my IP. I took the time to register for an ARN I then registered my intention to fly with CASA and in that process I agreed to operate within the Law.**

*The above point is very important.*

*"Captain Booth has pointed out there have been three incidents involving rouge drone in the landing path at Sydney airport in the last four weeks alone."*

This above point is taken from Sen Xenophon's press release "rouge drone" there is no doubt there are stupid people out there who can fly a drone like a rouge. But this is alarmist approach and a baseless attack on the Sub 2kg rules. Someone who takes the time to register with CASA and agrees to fly within the law is not a "rouge operator"

You can't honestly believe that Captain Booth believes that no regulation is better than some regulation. Because this is his stance on the issue along with Xenophon. Think about it.

These people are calling for the removal of legislation that actually lays down the rules for safe operation of the Sub 2kg class. Removing this legislation will not solve the "rouge drone" problem because those operators don't care about the rules.

This inquiry also needs to look at the wider issue of licencing why does it cost many thousands of dollars to become a licenced operator.

The inquiry needs to look at the “rouge drone” issue in its true context not in the Chicken Little the sky is falling alarmist stance by Xenophon who has made no comments on how to actually solve the problem. Removing legislation to encourage safe operation is not a solution to the “rouge drone” problem.

RPA Airworthiness:

I am a retired RAAF aircraft technician I served for over 20 years so I have a good understanding of safe operation of aircraft. I do have some concerns about how some Drone Manufactures operate. I currently own a DJI Inspire 1 this drone has had a number safety issues over its life (not just my Drone).

1. A flaw in propeller design cause the propellers to come off in flight. DJI came up with a temporary fix. Then a second design that also suffered from the same issue. The risk is 2.7kg of RPA falling from the sky out of control. In the real aviation world a directive would have grounded an aircraft because of issues like this. CASA did nothing and it was common knowledge I even reported it to CASA.
2. Software problems we basically have a toy maker producing software for an RPA that gets used in commercial operations. There are many documented fly away issues for DJI RPA's this still occurs now. Some of this can be attributed to user error and some to poor software development and deployment.

There is no actual airworthiness directives from CASA for RPA's like the ones produced by DJI or any other maker. Because I understand aviation safety I grounded my Inspire 1 because I believed the software posed an unacceptable risk to flight safety. I didn't fly it again until I thought the software improved. I judged this by reading community and user forums looking for issues that users have.

CASA need an airworthiness process that can ground RPA's that pose a risk because of design and software issues.

I understand the need to control “Commercial” Large RPA activity this work can be in challenging locations and that requires a user with skill and training.

There needs to be something between Recreational and Sub 2kg Commercial operations. It is not a commercial activity to sell a few prints a year from a hobby based site. In the Recreational class I can still fly my 2.7kg Inspire 1 yet I have no rights to any IP for images and video's as hobbyist I would very much like to use the Inspire 1 for my hobby and be able to sell images from that hobby. Please review the Recreational class and make some distinction between a Hobbyist Photographer and someone actually flying for paying customers. Allow us the freedom to sell our IP as a hobby.