

Drone Alliance Europe ('DAE') Response to the UK CAA's NERL Consultation

Drone Alliance Europe ('DAE') welcomes the opportunity to comment on the UK CAA's final proposals for the economic regulation of NATS (En Route) plc (NERL) in its implementation of the UK Airspace Design Service. DAE's membership comprises a range of airspace participants within the uncrewed aircraft systems (UAS) sector with a shared interest in promoting UAS integration into European airspace, including in the UK. To advance this goal, it is critical that regulations governing UAS operations are appropriately scoped to promote proportionality, efficiency and effectiveness.

This consultation notes that airspace change proposals (ACPs) aimed at facilitating beyond visual line of sight (BVLOS) UAS operations, as new users, are not currently included as within scope for the charging structure for UKADS, which is an approach that DAE supports. If the CAA later considers including ACPs devoted to new users within the UKADS charging arrangements, we request that it releases a separate consultation explaining the rationale and envisioned implementation. It is of the utmost importance to gather relevant input from UAS stakeholders to ensure that regulations are proportionate and reflective of industry use of government services. This industry engagement is essential to supporting the UAS industry's innovation and growth in the UK.

DAE appreciates the CAA's prioritisation of external input in developing regulations, including regarding airspace integration and associated services. We are confident that this approach will position the UAS industry, as well as the aviation sector in general, for success in the UK.