

# Detect and Avoid Policy Concept – Consultation Response Summary

CAP 3127



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#### Introduction

- 1.1 The Detect and Avoid (DAA) Policy Concept Consultation<sup>1</sup> (the 'Consultation' hereafter) was published by the CAA in July 2024. The Consultation was open for 8 weeks, from the 25<sup>th</sup> of July 2024 to the 19<sup>th</sup> of September 2024. It set out our initial position on DAA as an enabling technology for scalable Beyond Visual Line of Sight (BVLOS) operation of Unmanned Air Systems (UAS) within the UK, defining the DAA intended function, standardised terminology and a set of requirements for the DAA assurance and approval process.
- 1.2 The Consultation sought response to the DAA Policy Concept, inviting stakeholders to provide feedback on the key elements on a 6-point scale. Responders were also asked to explain their answer and provide any other general comment. The Consultation received 59 responses in total, 15 of which were permitted by the responder to be published by the CAA<sup>2</sup>.
- 1.3 This document provides the following:
  - A summary of the Consultation engagement and responses received.
  - Key response themes and initial CAA comment on each key theme.
  - A summary of the status of the DAA Policy Concept and next steps towards scaled 'Business as Usual' use of the DAA Policy.
  - Table versions of all figures can be found in Appendix A.

<sup>&</sup>lt;sup>1</sup> Detect and Avoid Policy Concept Consultation - Civil Aviation Authority - Citizen Space

<sup>&</sup>lt;sup>2</sup> <u>Published responses for Detect and Avoid Policy Concept Consultation - Civil Aviation Authority - Citizen</u> <u>Space</u>

#### **Our Approach**

- 2.1 The level of engagement with the Consultation can be gauged by the number of responses, the sectors represented and whether responses were organisational or personal. The level of support for different elements within the Consultation can be gauged by the 6-point scale response, with specific details and general comments available within the free text field associated with each question.
- 2.2 All responses were read and reviewed, with follow-on contact where any additional clarification was requested or required. As part of the policy development process the Consultation response was shared with stakeholders across the CAA and other government departments such as Department for Transport and the Ministry of Defence.
- 2.3 The Consultation response has been a useful initial step in gauging stakeholder opinion and maturing the DAA Policy Concept. The CAA is highly grateful to all participants and continues to prioritise the development of enabling policy to support equitable access for all air users.
- 2.4 The next steps for UK CAA DAA Policy development are discussed in Section 5, including the status of the DAA Policy and activities during a 'policy concept test phase', where the DAA policy will be updated based on feedback and experience, and more detailed Acceptable Means of Compliance (AMC) and Guidance Material (GM) will be developed.

#### **Bullet points**

#### Level of Engagement

- 3.1.1 The Consultation received 58 responses via the online portal and 1 via email. Additionally, a small group of external stakeholders were provided with an advance copy of the DAA Policy Concept ahead of the Consultation, with responses from that exercise also considered within this document.
- 3.1.2 Of the responses submitted via the online feedback form 51.7% were official on behalf of an organisation, and 48% were personal views See Figure 1.



Figure 1 – Are you responding in an official capacity on behalf of an organisation?

3.1.3 The cross section of communities represented in the survey is shown in Figure 2. The UAS community was the largest contributor with 44.8% of the responses, followed by General Aviation with 29.3%. Contributions were received from a wide cross section of stakeholders, including large manned aircraft manufacturing, Air Navigation Service Provision, large and small UAS manufacturers and operators, pilot and air traffic controller trade bodies, and military.



Figure 2 – Who are you answering as or representing?

3.1.4 From the UAS community responses, the expected Air Risk Class<sup>3</sup> (ARC) to operate in is shown in Figure 3. It can be seen that operations are planned across all ARCs, with ARC-b being the most popular. Although this aligns with our expectations on smaller UAS operating at low levels strong interest is also reported for ARC-c and ARC-d operations, routinely interacting with both general and commercial aviation.



<sup>&</sup>lt;sup>3</sup> Specific Operations Risk Assessment (SORA) | UK Civil Aviation Authority

Figure 3 – Which of the residual ARC do you expect to operate in?

#### Level of Support

3.2.2 The level of support for a range of elements within the DAA Policy Concept is shown across Figure 4 to Figure 9. Overall, feedback to the Consultation provided strong support for the DAA Policy Concept and showed understanding of the need for detailed scrutiny of supporting technology. Supportive or 'no-view' accounted for between 66% to 80% of the responses, with the remainder either disagreeing or strongly disagreeing. Specific themes of agreement and disagreement were captured in the free text options for each question, and these are discussed in Section 4 along with initial CAA response.



Figure 4 – How strongly do agree with proposed scope of the Detect and Avoid Policy Concept?



Figure 5 – How strongly do you agree with the overall intended function for Detect and Avoid?



Figure 6 – How strongly do agree with the levels of automation included in the Detect and Avoid Policy Concepts Intended function?



Figure 7 – Do you expect to have difficulties identifying which of the levels of automation your operations will fit in to?



Figure 8 – How strongly do you agree with the metrics we are including in the Detect and Avoid Policy Concept?



Figure 9 – How strongly do you agree that the requirements provided in the DAA Policy Concept are sufficient enough to ensure safe BVLOS reliance of DAA capabilities?

#### Key Response Themes

### Broad support for DAA to support integration of BVLOS UAS with manned aircraft

4.1 As discussed in Section 3, feedback to the Consultation provided strong support for the DAA Policy Concept and understanding of the need for detailed scrutiny of supporting technology. Supportive or 'no-view' accounted for between 66% and 80% of the responses.

# Concern from existing air users about the impact (cost / restrictions) of new air users

- 4.2 Several respondents expressed concern about suitability of the proposed approach to integration with manned aircraft such as paragliders, gliders, hot air balloons, etc. Additionally, concern was raised regarding possible new restrictions and the cost of fitting new required equipment (e.g., an approved Electronic Conspicuity (EC) device), and whether this cost should be borne by the new entrants.
- 4.3 CAA Response: When reviewing any proposed BVLOS UAS operations the CAA will always consider all air users. The encounter set of conflicting traffic that the DAA capability will be assessed against must be representative of all air users within the proposed operating environment, based on an airspace characterisation that informs an understanding of the local flying community. Specific concerns regarding EC suitability on different categories of manned aircraft and the associated cost is being addressed by ongoing EC policy development<sup>4</sup>. Finally, it should be emphasised that the CAA has a statutory duty under the CAA (Air Navigation) Directions 2023<sup>5</sup> to reflect the needs of all airspace users (including the emerging UAS industry) on an equitable basis.

#### **Concern about equipment reliance**

4.4 Several respondents expressed concern regarding equipment reliance, in particular the drive for UAS manufacturers to reduce cost resulting in low reliability software and hardware. Reliance on the C2 link to the remote pilot for human oversight was also cited as a concern, along with the necessary DAA algorithm and Human Factors assurance.

<sup>&</sup>lt;sup>4</sup> Joint Statement from CAA/DfT on the Development of a National Standard for Electronic Conspicuity | Civil Aviation Authority

<sup>&</sup>lt;sup>5</sup> Legislative framework to airspace change | Civil Aviation Authority

4.5 **CAA Response:** The CAA recognise the introduction of DAA is moving the UAS industry away from reliance on operational restrictions and toward increasing reliance on equipment, and hence equipment assurance. The DAA Policy Concept is part of this transition and provides a structured process and requirements to enable the CAA and each applicant to jointly assure that all required equipment performs in accordance with the safety standard for the operating environment. The DAA policy and assurance process is founded on established principles from the Airborne Collision Avoidance System (ACAS)<sup>6</sup>, as well as a range of technical standards including ICAO, RTCA, ASTM, Eurocae and JARUS. During the DAA Policy Concept test phase applicants will receive additional scrutiny by CAA Subject Matter Experts (SMEs) and be subject to enhanced oversight. Additionally, in line with CAP2533, initial BVLOS UAS operation integrated with 3rd party manned aircraft are expected to be limited to a Temporary Reserved Area (TRA), where a bespoke ruleset may be defined and an ANSP is able to provide an additional safety layer.

# Concern about suitable aviation competence of UAS pilots and operators

- 4.6 A concern was raised regarding appropriate aviation competency and licensing for UAS operators and remote pilots, and that this was not discussed within the DAA Policy Concept.
- 4.7 **CAA Response**: As with equipment reliance theme discussed above, the CAA will support the assurance of UAS operators and pilots using a structured process and requirements via operational authorisation under UK Regulation (EU) 2019/947. This process will be supported by the transition to UK Specific Operating Risk Assessment (SORA)<sup>7</sup> and the remote pilot competency framework<sup>8</sup>. UAS are entering an established and complex aviation environment which achieves a high level of safety through a combination of individual and organisation competence, equipment assurance, airspace organisation and management, data sharing and reporting etc. The CAA will ensure that all air users fully understand the environment within which they plan to operate.

### Concern about cost to the UAS community, with request that economic viability be considered

4.8 Several respondents expressed concern that elements of the DAA policy were beyond the capability of many UAS operators (e.g., Monte Carlo simulation). A concern was also raised that the complexity and cost of such an assurance process may be beyond the cost base of the emerging commercial UAS industry,

<sup>&</sup>lt;sup>6</sup> Commonly referred to as Traffic Collision Avoidance System (TCAS)

<sup>&</sup>lt;sup>7</sup> Specific Operations Risk Assessment (SORA) Update | Civil Aviation Authority

<sup>&</sup>lt;sup>8</sup> Pilot competence | Civil Aviation Authority

and therefore would accommodation measures be considered for operations where DAA equipment assurance is not currently economically viable?

4.9 **CAA Response:** As discussed in Section 4.5 the CAA recognises the step in complexity for many UAS operators and will consider targeted support in specific areas, for example provision of standard encounter models, availability of approved Monte Carlo simulation frameworks and validation of surveillance equipment performance. Regarding the request for accommodation measures where equipment reliance is not economically viable, the Airspace Modernisation Strategy (AMS) sets out full integration of BVLOS UAS with manned aircraft as the long-term vision. However, it is also recognised by the CAA that a transition period may be required to enable the commercial UAS industry to develop both the market opportunities and required equipment to meet this vision. Accommodation measures may be required during such a transition period, with the long-term objective of integration recognised and progressed towards. Additionally, the CAA also recognises that edge cases may exist where reliance on complex and expensive DAA equipment may not be proportionate when compared to simple accommodation measures such as procedural segregation<sup>9</sup>.

#### Feedback on SERA and Right of Way issues

- 4.10 Several concerns were raised around the issue of Right of Way (ROW) rules for collision avoidance, including:
  - Concerns around changes in the ROW rules resulting in required changes to currently developed functionality (either now or in the future).
  - Concern around ambiguities in the existing ROW rules, e.g., terms such as 'well clear' and 'proximity to other aircraft to create a hazard'.
  - Request for the position of the Unmanned Aircraft (UA) to be available to manned aircraft who can then keep their own distance.
  - Concern over Human Factors issues of manned aircraft monitoring for UA using 'head-down' equipment, especially while operating at low level.
  - Concern that UAS fleet operation with EC out will create an impractical airspace picture, creating a Human Factors issue for manned aircraft in receipt of EC-in.
- 4.11 **CAA Response:** The CAA acknowledges these concerns and is currently reviewing ROW rules for interaction between manned and unmanned aircraft. Regarding ambiguities in the ROW rules, DO-365C Annex H<sup>10</sup> discusses an

<sup>&</sup>lt;sup>9</sup> Using appropriate operating area surveillance and / or contact requirements to enable unmanned aircraft landing ahead of entry by manned aircraft into the operating area.

<sup>&</sup>lt;sup>10</sup> RTCA DO-365C Minimum Operational Performance Standards (MOPS) for Detect and Avoid (DAA)

approach to quantifying the ROW rules for software implementation, and this will be considered in the CAA's ROW review. Regarding UA position receipt by manned aircraft, it is recognised that many General Aviation (GA) pilots currently use uncertified EC devices to enhance their situational awareness. However, this voluntary use must be separated from requiring the use of such equipment and including it in the safety assessment. Regarding the manned aircraft EC-In picture from UAS fleet operations, consideration will be given to whether this is an environment where shared ROW responsibilities are feasible. This, and the fact that large UAS can be expected to operate and visually appear similar to manned aircraft raises the possibility of operation / area specific ROW rules. Options will be further explored by the CAA during the ROW review and ongoing sandbox / innovation projects.

#### Request to segregate UAS from manned aircraft

- 4.12 There was one request from the GA community to maintain segregation of BVLOS UAS from manned aircraft as they did not believe that integration would be safe.
- 4.13 **CAA Response:** BVLOS UAS will only be allowed to operate alongside 3<sup>rd</sup> party manned aircraft when the CAA are satisfied that safety levels will be maintained. The key issue with full segregation is the lack of scalability, and restrictions that it imposes on other air users. However, edge cases cannot at this stage be ruled out, for example UAS fleet delivery discussed in Section 4.11.

#### **Feedback on DAA Metrics**

- 4.14 Multiple comments were received regarding the DAA metrics, with the key themes as follows:
  - Concern over why Mid-Air Collisions (MAC) were not measured directly, rather than Near Mid-Air Collisions (NMACs).
  - Request for justification of the Risk Ratios (RR) performance targets.
  - Request for justification for NMAC and DAA Well Clear (DWC) volumes, and consideration of temporal definitions rather than only spatial.
  - Concern over operational suitability metrics such as flight path deviation opposing the primary safety metrics.
  - Emphasis that RRs are essentially averaging functions and may hide deficiencies in certain encounter cases.

Systems

- Emphasis that RRs are essentially dimensionless units, which only illustrate DAA performance relative to defined NMAC / DWC volumes and the chosen encounter sets.
- Concern about the consistency of the RR assessment process.

#### 4.15 CAA Response:

- Regarding measuring MAC directly, this is not usually done within the ACAS and DAA technical standards due to the additional complexity of modelling specific aircraft geometries. NMAC is used instead as a proxy for MAC, where the distinction between NMAC and MAC is left to providence, essentially being out of the control of the system or pilot.
- Regarding the RR performance targets and the NMAC / DWC volumes, these are taken directly from various technical standards. A temporal element is included in DWC for larger UAS operating within higher risk area, e.g., integrated IFR, and this is also under consideration for other encounters. The RR values were originally proposed to ensure that the DAA capability performs at least as good as or better than pilots and systems would perform in an equivalent encounter situation between manned aircraft. It should also be noted that for UA encounters with manned aircraft an NMAC is not assumed to always equate to a MAC. JARUS<sup>11</sup> assign an unmitigated probability of MAC given NMAC of between 1% and 10% depending on the type of encounter and size of UAS. It should also be noted that in the mitigated case the DAA capability can be expected to continue to attempt to avoid a MAC after an NMAC has occurred.
- Regarding the operational suitability metrics, the CAA accepts this point and will emphasise this risk in DAA policy updates. Operational suitability may be a greater concern for controlled airspace where interaction with an ANSP must be considered. However, such metrics also have a place for DAA system designers and operators to measure and understand the behaviour of their DAA capability.
- Regarding the averaging function nature of the RR metric, the CAA accepts this point and will ensure that the updated DAA policy will ensure that loss of DWC or NMAC events in the mitigated encounter are investigated to understand any deficiencies.

<sup>&</sup>lt;sup>11</sup> SORA Annex G (unpublished)

Regarding RR 'units' and consistency of the assessment process, the CAA accepts this point. Standard NMAC and DWC volumes are defined and during the test phase the CAA will look to standardise encounter sets and the depth of test evidence required for each test mode. The test phase will look to develop standard AMC and GM that can be published with the next DAA Policy update to support consistency in the regulatory pathway.

### Enthusiasm for international harmonisation and alignment with technical standards

- 4.16 Several respondents noted support for aligning with technical standards as a mechanism to support international harmonisation. The importance of keeping up to date with updated standards was also emphasised.
- 4.17 **CAA Response:** The CAA is fully in agreement with this point. The DAA policy was written to attempt to summarise key content from different technical standards, while still allowing flexibility in the detailed design solution if preferred. Specific subsections of individual standards may be used and referred to if the entire standard is not considered appropriate. Additionally, the CAA actively participates in several technical standard DAA working groups including the ICAO RPAS Panel and JARUS, which are our key mechanisms for international harmonisation for both certified and specific category UAS. Both of these groups include members from RTCA, ASTM and Eurocae DAA working groups ensuring alignment where appropriate. However, it should also be noted that the UK has a different airspace environment from both the US (primarily served by RTCA & ASTM) and Europe (primarily served by Eurocae), hence some UK specificity may remain.

# Request that DAA is viewed as part of a multi-layer conflict management strategy

- 4.18 One of the respondents emphasised that DAA performance should be assessed as part of a multi-layer conflict management strategy, rather than as a static set of requirements. This approach may allow flexibility in the DAA performance and assurance requirements, as dependent on the other mitigations available.
- 4.19 **CAA Response:** The CAA partially agrees with this point. The DAA Policy Concept was written as the DAA tactical mitigation requirement for the UK SORA, therefore a range of other strategic and tactical mitigations will also be available. Within the SORA methodology strategic mitigations allow for a reduction in the initial ARC to a residual ARC for the tactical mitigations to manage, so in this sense the DAA requirements are already affected by the multi-layer conflict management environment. Within the UK SORA the DAA requirements across ARC-b, ARC-c and ARC-d vary primarily by integrity, assurance and oversight, with the core RR performance targets remaining the same. Our view is that it would be difficult to justify a reduction in the RR targets.

However, within the SORA framework other tactical mitigations may be proposed to meet the requirement of the residual ARC, e.g., Unmanned Traffic Management (UTM) separation and deconfliction services.

# Enthusiasm to enhance the DAA policy scope to include UA-UA encounters

- 4.20 Multiple respondents requested the DAA policy scope be updated as soon as possible to include UA-UA encounters, citing the commercial need for multiple UAS operators within the same environment.
- 4.21 **CAA Response:** The CAA fully agrees with this point and will progress this scope expansion as a priority. The CAA is currently working with JARUS on SORA 3.0 which will also look to expand encounter scope to include UA-UA. An update to the DAA Policy Concept to include this scope expansion is currently planned for Q2 2026. However, given the likely reduced severity of a UA-UA collision compared to a UA-manned collision the current DAA policy provides a framework for UA-UA DAA, and an applicant is free to propose UA-UA specific requirements / updates during the DAA Policy Concept test phase<sup>12</sup> if preferred.

#### **Request for clarity on necessary evidence for DAA approval**

- 4.22 Several respondents commented that suitability of the policy was difficult to assess without explicit examples of acceptable evidence against each requirement. Example approval pathways are also required to support investment decisions ahead of further system development.
- 4.23 **CAA Response:** The CAA fully agrees with this point and is looking to develop example approval pathways for different categories of DAA capability during the policy concept test phase. These pathways will be captured as AMC and GM to be included with the next DAA policy update. Additionally, the CAA are working with JARUS on SORA 3.0 updates which will support both this development and international harmonisation.

### Regulatory pathway to recognise the role of DAA equipment manufacturers

- 4.24 A concern was raised that the level of effort required for a DAA approval would not be scalable for individual UAS operational approvals. Additionally, there was concern that UAS operators may not have access to sufficient technical detail for the process, and that such detail is typically available only to the equipment manufacturer.
- 4.25 **CAA Response:** This point is related to the transition of UAS approvals from relying primarily on operational restrictions to also relying on equipment as

<sup>&</sup>lt;sup>12</sup> See Section 5 Next Steps for additional information on the Test Phase.

discussed in Section 4.4. Scalability concerns are noted, and during the DAA Test Phase additional regulatory pathway options will be confirmed, including the potential use of certified / approved equipment within specific category approvals.

#### Concern about an increased mid-air collision risk

- 4.26 Several respondents expressed concern that BVLOS UAS integrated with manned aircraft would inevitably result in an increased risk of airborne conflict, and that equipment manufacturers and operators simply maintaining the defined RRs would lead to increased loss of separation events. Additionally, it was suggested that DAA should not be seen as a single suitable mitigation, and additional mitigations should always be applied where possible.
- 4.27 **CAA Response:** The adopted RR performance targets have been set to perform at least as well as piloted see and avoid in equivalent manned aircraft encounters. Additionally, a progressive approach to the approval of DAA capabilities will be taken during the DAA Policy Concept test phase, with a limited number of applications considered and enhanced oversight of any approvals. Additionally, in line with CAP2533 initial BVLOS UAS operation integrated with 3<sup>rd</sup> party manned aircraft are expected to be limited to a Temporary Reserved Area (TRA), where a bespoke ruleset may be defined and an ANSP is able to provide an additional safety layer. Only after sufficient experience with this test phase, evidence of suitable performance and a lack of unexpected negative consequences will the CAA progress towards scaled operations. Regarding DAA not being seen as a single suitable mitigation, the UK SORA enables a multi-layer conflict management approach to be taken, while also following the As Low As Reasonably Practicable (ALARP) principle.

#### **Next Steps**

- 5.1 The DAA Policy Concept is intended to position both the UK CAA and industry applicants for the proportionate assurance and approval of the use of Detect and Avoid (DAA) systems within UK airspace, subject to appropriate conditions and limitations.
- 5.2 The DAA Policy Concept is an operational, or 'live', policy meaning that it may be used in support of an UAS operational authorisation under UK Regulation (EU) 2019/947 . The 'concept' status signifies that its use will be limited to a test phase, to ensure completeness and suitability of the requirements and further develop the AMC and GM ahead of scaled 'Business As Usual' applications. The test phase allows applications to be given additional scrutiny by CAA Subject Matter Experts (SMEs), which means that we may need to limit the number of applications at any one time.
- 5.3 Any DAA authorisations during the test phase will also be subject to an enhanced oversight phase to gather further evidence of safe operation and monitor for any unexpected consequences. In line with CAP2533 initial BVLOS UAS operation integrated with 3rd party manned aircraft may be limited to a TRA, where a bespoke ruleset may be defined and an ANSP is able to provide an additional safety layer. Dependent on the DAA capability and the operating environment the requirement for an ANSP will be examined as part of the transition from a TRA towards a Transponder Mandatory Zone (TMZ) in line with the AMS .
- 5.4 The Consultation was the initial step in the test phase, and feedback received will be used to develop and mature the DAA Policy. Updates to the policy will be driven by multiple sources, including:
  - Consultation response. Many detailed comments and recommendations were received beyond those reported within the document, and these will all be considered in the future updates.
  - Applicant led testing (discussed above).
  - Scope expansion, e.g., consideration of UA-UA encounters.
  - Engagement with technical standards bodies to support international harmonisation, e.g., ICAO UAS Panel, RTCA, ASTM, Eurocae and JARUS, via development of SORA 3.0.
  - Ongoing alignment with other CAA policies
  - Preparation for 'Business as Usual' DAA applications, including engagement with the CAA UAS Sector team.

- 5.5 In addition to the above the CAA may also commission additional work, potentially including bespoke trial campaigns to gather evidence of performance of specific elements of a DAA capability. Additional detail on this will be made available when ready.
- 5.6 The next published update to the DAA Policy is currently scheduled for Q2 2026, with the 'Business as Usual' version scheduled to align with the aims of the Future of Flight Programme in 2027. A further formal public consultation may also be included towards the end of this process and ahead of policy adoption

### Nomenclature

ALARP	As Low As Reasonably Practicable
AMC	Acceptable Means of Compliance
AMS	Airspace Modernisation Strategy
ARC	Air Risk Class
BVLOS	Beyond Visual Line of Sight
CAA	Civil Aviation Authority
DAA	Detect And Avoid
DWC	DAA Well Clear
EC	Electronic Conspicuity
GA	General Aviation
GM	Guidance Material
IFR	Instrument Flight Rules
JARUS	Joint Authorities for Rulemaking and Unmanned Systems
MAC	Mid Air Collision
NMAC	Near Mid Air Collision
RPAS	Remotely Piloted Air System
RR	Risk Ratio
SME	Subject Matter Experts
TRA	Temporary Reserved Area
UA	Unmanned Aircraft
UAS	Unmanned Air System
UTM	UAS Traffic Management

#### **Point of Contact**

7.1 Any queries or further guidance required on the content of this consultation should be sent to <u>airspacemodernisationdelivery@caa.co.uk</u>.

#### APPENDIX A

### Tables of Responses

Question	Yes	No	Not answered
Response in a official capacilty on behalf of an organisation?	30	28	1

Question	UAS	Member of the GA community	Commercial aviation	National representative org, e.g., trade union	Central or local government body incl. military	Resident affected by aviation
Who are you answerings as or representing?	26	17	5	5	5	1

Question	ARC-a	ARC-b	ARC-c	ARC-d
Which of the residual ARC do you expect to operate in?	3	11	7	6

Question	Strongly agree	Agree	No strong feelings / No view / don't know	Disagree	Strongly disagree
How strongly do agree with proposed scope of the Detect and Avoid Policy Concept?	7	25	8	12	7

Question	Strongly agree	Agree	No strong feelings / No view / don't know	Disagree	Strongly disagree
How strongly do you agree with the overall intended function for Detect and Avoid?	8	30	9	6	6

Question	Strongly agree	Agree	No strong feelings / No view / don't know	Disagree	Strongly disagree
How strongly do agree with the levels of automation included in the Detect and Avoid Policy Concepts Intended function?	6	28	13	5	7

Question	Νο	No strong feelings / No view / don't know	Yes
Do you expect to have difficulties identifying which of the levels of automation your operations will fit in to?	25	22	12

Question	Strongly agree	Agree	No strong feelings / No view / don't know	Disagree	Strongly disagree
How strongly do you agree with the metrics we are including in the Detect and Avoid Policy Concept?	1	21	20	12	5

Question	Strongly agree	Agree	No strong feelings / No view / don't know	Disagree	Strongly disagree
How strongly do you agree that the requirements provided in the DAA Policy Concept are sufficient enough to ensure safe BVLOS reliance of DAA capabilities?	2	17	20	9	11