## Betreff: AW: EASA regulation on Unmanned Aircraft Operations

Dear Bruno, dear CIAM Delegates

It is with utmost concern that the Swiss Aeromodelling Federation SMV/FSAM took notice of the publication of the EU 'Prototype' Commission Regulation for Unmanned Aircraft Operations from August 22<sup>nd</sup> 2016. SMV/FSAM considers the 'Prototype's' intention to control the building and flying of model aircraft by regulations for unmanned aircraft as an unprecedented, severe threat for aeromodelling communities and the related suppliers in Europe. Negligent the needs of several hundred thousands of active hobbyists, as well as ignoring the extraordinary educational value of aeromodelling and disregarding the excellent safety record of model aircraft operations, the authors of the Prototype Regulation have classified model aircraft as Unmanned Aircraft. This does not do justice to the more than 100 different categories and classes of today is building and operating of model aircraft, both for the purpose of leisure and for international sport. Therefore:

- 1. The Swiss Aeromodelling Federation SMV/FSAM declines all of the aeromodelling related content of the EU 'Prototype' Commission Regulation for Unmanned Aircraft Operations from August 22<sup>nd</sup> 2016.
- 2. SMV/FSAM urges FAI to <u>abstain from negotiating details</u> of the 'Prototype', as suggested in the December 1<sup>st</sup> 2016 letter from Bruno Delor, as this signals FAI's basic approval of the unwanted principal intent of EASA.
- 3. SMV/FSAM suggests to exclude aeromodelling from the 'Prototype' by amending article 15 as follows:

"For the purpose of this regulation, all types of fixed- and rotary wing model aircraft up to a mass of 30 Kgs, (incl. multi rotor types, free flying models and space models), being operated within visual line of sight for purposes of education, leisure and sports are not considered as unmanned aircraft. Building and flying of such model aircraft is excluded from the regulations for unmanned aircraft operations."

The above suggestion is perfectly in line with the current Swiss national regulation for aeromodelling. It reflects, too, the intention of the Federal Office of Civil Aviation FOCA intending to keep its authority on regulation of UA's below 150 Kgs.

Dear CIAM delegates, actively defending the rights of individual aeromodellers is now an indispensable obligation for national and international roof organisations. Therefore, the Swiss Aeromodelling Federation SMV/FSAM invites both, fellow European NAC's and FAI, to join our efforts by officially taking a firm position against intentions trying to over-regulate our activities in an unacceptable way.

Thank you

Peter Germann
President SMV/FSMA
Vice President Swiss Aero-Club
peterdgermann@bluewin.ch