Meeting EASA - DMFV June 12, 2017

Questions to EASA

I. Aeromodelling

- The DMFV (and other organisations like Europe Airsports) opposed the integration of model aircraft into the frame of UA/UAS which EASA proposes. Why do you insist on that integration?
  The UAS definition in the revised Basic Regulation (replacing EU 216/2008) includes remotely piloted aircraft operated for recreational purpose. As technologies like flight controllers, stabilizing systems and even cameras or telemetry systems are sometimes implemented in aircraft used for recreational purpose and the same aircraft might be operated as “model aircraft” or for other tasks a clear differentiation is not possible. For this reason the UAS regulation has to include also “model aircraft”, but ensuring a proportionate approach allowing to continue operation with a known good safety record.
- Why don't you - as we see it - accept the differences between the performing of flight tasks and the collection of data drones are made for?
  There are a large variety of drones and they can be used also for leisure activities, not only to collect data for commercial reasons.
- Are you aware of the fact that aeromodelling for 110 years now implies performing of flight tasks basing on skills of the builder and/or of the pilot of the model, in many cases as a competitor?
  EASA recognises the safety environment developed by model clubs and associations resulting in good safety records. For this reason EASA developed a dedicated article 14 to allow Member States to grant them a special authorisation. No additional technical requirements are mandated to model aircraft. If the Member State decide to use this possibility, members of model club and associations can continue to operate as today.
- Do you see that said performing of flight tasks can't be the work of an unknown programmer without destroying aeromodelling as a whole? That the absence of computerized programs for the flights is the core of aeromodelling? That automated flying means committing suicide for aeromodelling at all?
  The proposed regulation defines several options dedicated to model aircraft flights:
  1. Art14: If flights are conducted in model clubs or associations, Member State can provide special authorisation providing limitations and deviating from all requirements in the regulation.

2. Art 12: member states can define special zones where operational limitations are alleviated (i.e. maximum altitude). In these areas model aircraft can be operated as today
3. Operations in category A3 appropriately developed for those not willing (or unable) to make use of the above 2 options. The UAS class C4 have been created to fit model aircraft. The only technical requirement mandated is to include in the model package the manufacturers manual and a copy of the leaflet with dos and don'ts

- What have - in your perception - freeflight models with rubber motors, RC aerobatic models, paraglider models or model rockets in common with camera equipped multicopter drones? Do you see them sharing the same airspace (like birds)? What else?
  These models fits the definition of unmanned aircraft and, based on their size (and inherent kinetic energy) they might pose a risk in case of impact with a manned aircraft or a person.

II. Safety Record of Aeromodelling

- Did you ever took into account that in practise and precisely defined drones and model aircraft don't share the same airspace?
  Since a drone can be used also for leisure, nothing prevent a drone pilot to operate his drone in the same zone and airspace used by model fliers.
- RC controlled model aircraft are not easily piloted or controlled as for instance take offs and landings are neither stabilized nor automated. Nevertheless - their safety record during the last 50 years is stunning. How do you explain said phenomena?
  EASA recognises the special skill of model pilots and their aviation passion. For this reasons the 3 options defined above were developed.
- Do you accept the fact that main reason for the good safety record over decades of aeromodelling is the integration of rookies into the group of experts? That the school which teaches the newcomers are their club mates?
  Yes. EASA recognises the value of model clubs and associations and for this reason Article 14 was developed

III. Clubs and Associations

- Clubs and associations are joined by people wishing to practise aeromodelling in public. Therefore they are willing to pay insurance fee, membership fee, fee for using the flying field. They want to share the community of aeromodellers for developing their building and flying skills. Do you agree?

Yes. EASA recognises the value of model clubs and associations and for this reason art 14 was developed

- Why should buyers of drones join clubs and associations dedicated to aeromodelling? Insurance - may be. Membership (i.e. necessary for flying in competitions) - no. Flying fields - no (boring for cameras). Flying within a community - no (they share their photographs via internet with interest groups).
  Agree a drone pilot may or may not join a model club. Both drone pilots flying for leisure and model pilots will be able to operate using one of the three options defined above.
- The EASA NPA insinuates in Article 14 that clubs and associations take control of drone operation according to the framework of rules you invented. How will that be possible with drone pilots neither willing to share real communities nor to use common flying fields?
  Art 14 is not intended to force drone pilots to join model club. Even if this is a possibility. Art 14 was developed actually purely to allow model aircraft operations conducted in the framework of model clubs, as they are today.