



WE ARE ALL ONE IN THE SKY

Brussels, 25 January 2021

Subject: High-level regulatory framework for unmanned aviation operations and UAS traffic management (U-Space)

Dear EU Member States,
Dear Commission,

We, the signatories, would like to reiterate our commitment to support the work of the Commission and EASA to develop a high-level regulatory framework for unmanned aviation operations and UAS traffic management (UTM / U-Space). This Regulation is an important first step in establishing a performance-based and risk-based regulatory framework. One which shall provide some certainty and reassurance to all airspace users and which will enable the development of the drone services economy and the multiple societal and economic benefits that drones can deliver.

We welcome the progress that has been made in the latest draft of the U-Space regulation and would like to offer our support to address the remaining open issues. We are positive that by working together with all stakeholders we will find the appropriate solutions to the following issues in a safe and efficient way:

1. The **concept of dynamic reconfiguration of airspace** between ATM and U-space needs to be further clarified. Our operational experience shows that, even with different categories of manned operations, segregating the airspace further does not necessarily mitigate the safety risk and the associated disruption to operations (i.e. the number of airspace infringements has increased significantly over recent years mainly due to the complexity of the European airspace). An appropriate tactical separation management service should be defined to prevent collisions between drones and manned aircraft. Without a fully supported technical concept the primary U-Space objective of a joint utilization of U-Space by manned and unmanned operators cannot be implemented. As a result airspace restrictions for manned aviation would emerge whenever a UAS flies outside of the line of sight of its operator.
2. The “**common information service**” under the responsibility of an identified designated certified Common Information Service Provider (CISP) should be reinforced and explicitly required to be provided as “single point of truth” and as the single point of access for information exchange and coordination procedures among ATSPs, USSPs and other stakeholders. It shall capture the status of operations in any given piece of airspace, at any given point in time, in order to create the conditions for manned and unmanned aircraft to operate orderly and safely alongside each another / in parallel, in the airspace (controlled and uncontrolled) where ever U-space services are provided.
3. **Current surveillance infrastructure and technology for manned aviation** can only be used to provide Traffic Information Service (TIS) for unmanned aviation in very limited parts of the airspace at the very low levels in question. At least that is the case in countries with a significant uncontrolled airspace. New surveillance and communication (C2) infrastructure and technology (such as 3/4/5G or the AeroMACS networks) which would allow a



significantly better coverage at very low level is hampered by the lack of European TIS performance requirements on infrastructure as well as on airborne equipment.

4. The responsibilities and liabilities to be borne by different actors should also be further clarified:

- The Regulation creates a framework in which it is unclear with whom the ultimate responsibility for safe separation lies and, therefore, with whom liabilities lie.
- More comprehensive and balanced roles and responsibilities between U-Space Service Providers (USSP), Common Information Service Provider (CISP) and Air Traffic Service Providers (ATSP) are needed.
- Whereas the safety and security responsibilities of ATSP and manned operators are thoroughly detailed (e.g. SERA), the proposed regulation should also provide similar clarity on the allocation of responsibilities and liabilities of the USSP and CISP.

5. The Business and financial aspects not be left aside

- The cost of integration shall not be borne by the already existing/operating airspace users, gliders, helicopter, and airplane pilots or their passengers but in fact should be covered by the drone operators to whom the services are offered (according to ICAO).
- It is important to clarify how this proposal fits into the framework created by the Commission's proposal *on the implementation of the Single European Sky (SESII+)*. Two regulations with a potential overlap in the future should be avoided.
- All implications related to U-space, ANSPs and other Airspace Users shall be assessed altogether in order to provide a comprehensive and accurate impact assessment (incl. costs).

In order to deliver a suitable, market based, effective, secure and safe regulation that enables the uptake of the drone services economy, we believe that further engagement with both manned and unmanned stakeholders is essential to address the above mentioned issues.

We are certainly available and interested for any further discussion on this matter and look forward to jointly developing a regulation that will provide a solid basis for this fledgling industry.

Sincerely,

Signatories: Members of the We are ALL ONE in the Sky initiative

- Airlines for Europe (A4E)
- Airports Council International Europe (ACI EUROPE)
- Civil Air Navigation Services Organisation (CANSO)
- Europe Air Sports (EAS)
- European Business Aviation Association (EBAA)
- European Cockpit Association (ECA)
- European Helicopter Association (EHA)
- European Regions Airline Association (ERA)
- General Aviation Manufacturers Association (GAMA)
- International Council of Aircraft Owner and Pilot Associations (IAOPA)
- International Air Transport Association (IATA)
- International Federation of Air Line Pilots' Associations (IFALPA)
- International Federation of Air Traffic Controllers' Associations (IFATCA)
- International Federation of Air Traffic Safety Electronics Associations (IFATSEA)

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