

You can save this page as HTML and then open it in Microsoft Word for further editing.

| | |
|-------------------|--|
| Title | Introduction of a regulatory framework for the operation of drones |
| NPA Number | A-NPA 2015-10 |

Asociația Română de Aeromodelism (andras.babos@aeromodelism.ro) has placed **6** unique comments on this NPA:

| Cmt | Segment description | Pag | Comment | Attachm |
|------------|--|------------|---|----------------|
| 2286 | EXECUTIVE SUMMARY | 1 | <p>Definitions: <i>To add in definitions:</i> "densely populated areas" - areas with ensembles of buildings in urban or rural areas, and any land on which large numbers of people gather for recreational purposes or for participation in events outdoors Obs: Airspace user definition are not defined in the proposed regulations Obs: Model Aircraft definition are not defined in the proposed regulations. Please consult www.FAI.org</p> | |
| 2273 | 3.2 Low-risk operations— 'open' category Technology | 17 - 19 | <p><i>To be removed:</i> "To prevent unintended flight outside safe areas and to increase compliance to applicable regulations, it is proposed to mandate geofencing and identification for certain drones and operation areas. <i>To add:</i> "To prevent unintended flight outside safe areas and to increase compliance to applicable regulations, it is proposed to mandate geofencing and identification for certain drones and operation areas. Identification should be done via Radio-Frequency Identification (RFID) system"</p> | |
| 2276 | 3.2 Low-risk operations— 'open' category Limitations | 21 - 22 | <p><i>To be removed:</i> "A drone in the 'open' category shall not operate at an altitude exceeding 150 m above the ground or water." "The pilot is responsible for the safe operation and safe distance from uninvolved persons and property on the ground and from other airspace users and shall never fly the drone above crowds (> 12 persons)." <i>To add:</i> "Operation of Model Aircrafts is not permitted in 'densely populated areas' . " "Model Aircrafts operating in 'limited-drone zones' or 'no-drone zones' is permitted only if are not in 'densely populated areas'" "The pilot is responsible for the safe separation from any other airspace user(s) and shall give right of way to any other airspace user(s), except free flight Model Aircrafts." (Obs: There is no any possibility to control the free flight Model Aircrafts after take off) "A drone in the 'open' category shall not operate at an altitude exceeding 150 m above the ground or water</p> | |

| | | | | |
|------|---|---------------|--|--|
| | | | <p>except Model Aircrafts" (Obs: Some FAI - www.fai.org classified Model Aircrafts in competitions or trainings are exceeding more than 250 m above the ground or water)</p> <p>"The pilot is responsible for the safe operation and safe distance from uninvolved persons and property on the ground and from other airspace users and shall never fly the drone above crowds (> 12 persons), except Free Flight Model Aircraft" (Obs:Free flight Model Aircrafts can't be controlled via RC system, they have a default mechanical or electrical settings of flying time until take off)</p> | |
| 2279 | 3.2 Low-risk operations— 'open'category, Mass and subcategorisati Proposal 15 | 23 | <p><i>To be removed:</i></p> <p>"Any drone sold as a toy or consumer product with a mass below 1 kg could comply with the applicable product safety Directive and shall have limited performance to assure flight below 50 m above ground and local operation or alternatively the means to automatically limit the altitude and the airspace they can enter. "</p> <p>"Operation shall be performed below 50 m above ground. "</p> <p><i>To add:</i></p> <p>"Any drone sold as a toy or consumer product with a mass below 1 kg could comply with the applicable product safety Directive and shall have limited performance to assure flight below 50 m above ground and local operation or alternatively the means to automatically limit the altitude and the airspace they can enter, except Model Aircrafts "</p> <p>(Obs: Some FAI - www.fai.org classified Model Aircrafts in competitions or trainings are exceeding more than 250 m above the ground or water)</p> <p>"Operation shall be performed below 50 m above ground, except Model Aircrafts "(Obs: Some FAI - www.fai.org classified Model Aircrafts in competitions or trainings are exceeding more than 250 m above the ground or water)</p> | |
| 2280 | 3.2 Low-risk operations— 'open'category, Mass and subcategorisati Proposal 16 | 24 | <p><i>To be removed:</i></p> <p>"Any drone sold as a consumer product which is heavier than 1 kg could comply with the applicable general product safety Directive and shall have the means to automatically limit the airspace it can enter and the means to allow automatic identification."</p> <p><i>To add:</i></p> <p>"Any drone sold as a consumer product which is heavier than 1 kg could comply with the applicable general product safety Directive and shall have the means to automatically limit the airspace it can enter and the means to allow automatic identification, except Model Aircrafts"</p> <p>" Model Aircrafts operating in the 'limited-drone zones' shall not have active identification.</p> <p>" Model Aircrafts operating in the 'no-drone zones' shall not have active identification"</p> | |
| 2282 | 3.2 Low-risk operations— 'open'category, Mass and | 24 - 25 | <p><i>To be removed:</i></p> <p>"Any drone sold as a consumer product which is heavier than 4 kg could comply with the applicable general product</p> | |

| | |
|--------------------------------|--|
| subcategorisati Proposal 17 | safety Directive and shall have the means to automatically limit the airspace it can enter and the means to allow automatic identification. " |
| | <i>To add:</i> |
| | "Any drone sold as a consumer product which is heavier than 4 kg could comply with the applicable general product safety Directive and shall have the means to automatically limit the airspace it can enter and the means to allow automatic identification, except Model Aircrafts " |
| | "Operation in the 'limited-drone zones' or 'no-drone zones' is permitted in the 'open' category for Model Aircrafts with a take-off mass above 4 kg in case they are not in 'densely populated areas' " |
| | " Model Aircrafts operating in the 'no-drone zones' shall not have active identification" |
| | " Model Aircrafts operating in the 'limited-drone zones' shall not have active identification" |