



CASA NPRM - Frequency use at low level in Class G airspace

This proposal has two elements that are intended to be implemented together:

Establish MULTICOM below 5,000 feet

This change would allow VFR and IFR aircraft to monitor and broadcast on the MULTICOM frequency of 126.7 MHz up to but not including 5,000 feet AMSL in Class G airspace where a discrete frequency, such as a CTAF or broadcast area, does not exist.

AND

Expand the airspace volume of CTAFs

At non-controlled aerodromes this change would expand the volume of airspace contained in the CTAF to a 20 nautical mile radius laterally and up to, but not including, 5,000 feet AMSL vertically. For the few aerodromes with an elevation of 3,000 feet AMSL or higher, the vertical limits would extend to 3,500 feet AGL.

RAAA Position

The RAAA understands and supports CASAs proposal of changing the procedures for radio frequency use in low level airspace by maximising the opportunity for aircraft operating at low level in Class G airspace to be on the same frequency and to make and receive broadcasts for 'alerted see-and-avoid'.

This proposal will ensure that aircraft conducting instrument approaches, or those high performance RPT jet and turbo-prop aircraft using the aerodrome, are on the same frequency as aerodrome traffic. This would have the desired effect of eliminating multiple frequency changes during climb and descent and ensure transmissions at busy aerodromes do not experience clutter from the MULTICOM frequency.

However, the only way to ensure safe and effective implementation would be for all common traffic advisory frequency (CTAF) areas to be expanded under the proposal. We understand that at non-controlled aerodromes this proposed change would expand the volume of airspace contained in the CTAF to a 20 nautical mile radius laterally and up to, but not including, 5,000 feet AMSL vertically.

The RAAA also supports the proposal of establishing MULTICOM below 5,000 feet, as this would allow VFR and IFR aircraft to monitor and broadcast on the MULTICOM frequency of 126.7 MHz Class G airspace where a discrete frequency, such as a CTAF or broadcast area, does not exist.

Together, these elements would provide safety benefits for both IFR and VFR flights, provide additional protection for passenger transport operations and reflect the strong preference from the aviation community for keeping air traffic control transmissions separate from general transmissions, particularly at aerodromes.

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Mike Higgins
Chief Executive Officer
Regional Aviation Association of Australia