



Boeing Australia Holdings

RESPONSE TO THE CONSULTATION ON THE AUSTRALIAN AIRSPACE POLICY STATEMENT (AAPS) 2025

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Boeing Australia Holdings appreciates the opportunity to respond to the consultation on the Australian Airspace Policy Statement (AAPS) 2025.

About Boeing Australia Holdings

Boeing has the broadest portfolio in Australian aerospace, with over 4400 employees and an extensive supply chain supporting our advanced manufacturing of commercial aircraft composite components, defence systems design and development, modelling and simulation, research and development, support and training across civil and defence domains. Our products and services include conventionally piloted, remotely piloted aircraft systems, and advanced air mobility sectors.

Boeing Australia subsidiaries include:

- Boeing Aerostructures is Australia's only manufacturer of high-end aero-structure components, providing customers with a complete solution to aircraft component manufacture – from developing the most aerodynamic and efficient design, to rigorous testing processes.
- Boeing Defence Australia is Australia's leading defence aerospace enterprise, supporting some of the largest and most complex programs for the Commonwealth of Australia, the Australian Defence Force – including the Royal Australian Air Force, Australian Army and Royal Australian Navy - and commercial customers.
- Boeing Distribution Australia is a leading solutions provider of aftermarket supply-chain management services for the aerospace, defence and marine industries, serving more than 500 customers in Australia.
- Insitu Pacific specialises in the design, development, and manufacture of high-performance and low-cost uncrewed aircraft systems for commercial and military applications.
- OzRunways, a market leading Electronic Flight Bag (EFB) developer and service provider in Australia and New Zealand and a trusted EFB in regions such as South Africa, Latin America and Asia Pacific.
- Wisk Australia, a leading advanced air mobility company and developer of the first all-electric self-flying air taxi bringing the future of flight to Australia.

Australian Airspace Policy Statement 2025

Boeing is supportive of the Australian Airspace Policy Statement 2025 and makes the following recommendations.

General

Consistent with Boeing's input towards the development of the 2024 Australian Aviation White Paper, Boeing:

- Welcomes the explicit inclusion of advanced air mobility within the AAPS and related policy objectives and priority initiatives that support their safe, efficient and timely integration into Australian Airspace.
- Boeing welcomes the recurring directive for Australian policies to incorporate more risk-based and data-driven insights in its oversight, management and reform of Australia's airspace system. Boeing sees opportunities to extend this priority to include industry-government safety and operational data-sharing programs.

Function and powers in connection to Australian-administered airspace

- Boeing notes that neither the Australian Transport Safety Bureau (ATSB) nor the Australian Communications and Media Authority (ACMA) have been specifically identified as important contributors to Australian-administered airspace. Boeing recommends the department consider expanding the terms of reference to include these important regulators.
- Boeing highlights that radio spectrum considerations will underpin the Government Policy Objectives of *Safety and Regulatory Certainty for New Aviation Technologies*. The management and protection of existing aeronautical allocated spectrum is of paramount safety importance. This is highlighted by the recent activities with respect to potential interference into aircraft radio altimeters from new 5G mobile service operations in the 3 MHz frequency band and increasing international radiofrequency jamming of radionavigation services essential to aircraft location and positioning. Boeing has worked closely with international safety and spectrum authorities, including the U.S. Federal Communications Commission and Federal Aviation Administration) to address such matters. Further, effective and controlled provisioning of the radio spectrum will be essential to the realisation of future airspace concepts and infrastructure, including Uncrewed Traffic Management (UTM) / Flight Information Management System (FIMS).
- While it is noted that the Minister makes separate Statements of Expectation to the ATSB and ACMA, Boeing encourages government to formally identify the important and necessary contributions made by the ATSB and ACMA to Australian-administered airspace through the AAPS.

Government Policy Objectives

Boeing supports the Government Policy Objectives (GPOs) listed in the AAPS 2025.

- While implicit to some of the Policy Objectives and priority initiatives in the draft AAPS, Boeing notes the absence of a specific GPO concerning sustainability. More specifically, Government recognition of the critical role airspace design and the reliable and efficient delivery of Air Navigation Services plays in helping to achieve Australia’s and Industry’s commitment to global emission reductions. Boeing recommends a strengthening of the stated policy objectives and priorities to reflect Government and industry commitments.
- Boeing welcomed the Government’s commitment to explore a broad mandate for ADS-B equipage through its inclusion as an initiative in the 2024 Aviation White Paper. Noting the complexity and likely timeline for such a mandate, and its strategic significance to other GPOs in the draft AAPS, Boeing recommends the inclusion of a GPO relating to the advancement of the ADS-B equipage mandate. The Government may wish to consider broadening such a GPO to include other “strategic infrastructure and enabling technology” priorities. Including but not limited to, the acceleration of the certification and rollout of safety-of-life aviation navigation services of Southern Positioning Augmentation Network (SouthPAN). Such services offer significant safety, airspace capacity and efficiency benefits for all users of the Australian Airspace System. SouthPAN aviation SOL navigation services are also an enabling capability to future airspace and air traffic management operational concepts.

Airspace Administration

Boeing supports the Airspace Administration priorities and considerations listed in the AAPS 2025 and welcomes the specific inclusion of the ‘uncrewed’ aviation sector.

- Implicit to many of the stated principles concerning the administration of Airspace is equity of airspace access for all airspace users, existing and emerging. Boeing recommends this important consideration be made explicit in the statement of principles.

Airspace Classification used in Australian-administered Airspace

Boeing supports the general alignment with ICAO prescribed airspace classes and associated levels of service.

Review and Change of Airspace Classifications, Services and Facilities

In consideration of the Government Policy Objectives of *Regulatory Certainty for New Aviation Technologies*, Boeing encourages the Government to consider:

- The need to develop new rulesets beyond VFR and IFR to enable the safe and efficient operation of increasingly automated crewed and uncrewed aircraft. Internationally, work to define these new rulesets is underway and have been referred to as Digital Flight Rules (DFR), Automated Flight Rules (AFR) and Enhanced VFR (eVFR).
- Separation standards relevant and applicable to new technologies (platforms and systems), and the future mix of airspace users.
- Air Traffic Management (ATM) services relevant and applicable to the future mix of airspace users.



Australia's Future Airspace Framework

Boeing welcomes the inclusion of AFAF as a priority initiative and looks forward to supporting its execution through the associated CASA Technical Working Group.

Consistent with Boeing's response to the Government's 2024 Aviation Green Paper – the AFAF should look to establish a long-range operational concept to guide the evolution of Australia's airspace system. This should be underpinned by a dedicated roadmap for its implementation. This roadmap would outline the incremental objectives, and underlying changes in legislation, infrastructure, equipage, standards and procedures needed to realise it.

Part of the work of the AFAF should be to explore the longer-term role of enabling infrastructure such as supplementing traditional VHF voice communications with expanded digital communications and the role of Uncrewed Traffic Management (UTM) and the Flight Information Management System (FIMS) to support future airspace operational concepts. Specifically, defining how UTM (and underlying Flight Information Management System) could be expanded to include services in support of the safe and efficient management of airspace for conventionally piloted aircraft and Advanced Air Mobility (AAM).

Glossary of Terms

Boeing encourages government to broaden the definition / scope of UTM to include all uncrewed aircraft (i.e., the term "drone" implies small platforms below 400 feet above ground level) and Advanced Air Mobility (AAM).

Boeing Australia appreciates the opportunity to respond to the consultation on the Australian Airspace Policy Statement 2025.

Respectfully submitted

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