

27/04/2016

From

To

Respected Sir,

Sub: COMMENTS ON AIR TRANSPORT CIRCULAR On the Subject: Guidelines for obtaining Unique Identification Number (UIN) & Operation of Civil Unmanned Aircraft System (UAS)

At the outset, I would like to thank DGCA for formulating guidelines for regulating the use of UA in the Indian Air Space for the Safety of the Personnel and properties of the nation. Also, I would like to thank DGCA for seeking comments on the guideline from the public before implementing.

After reading the draft guidelines, I understand that **these guidelines are mainly focussed on commercially manufactured Unmanned Aircrafts (UA)** and have not covered properly the Aero Modelling Activities (Model Aircraft) by individuals for hobby or recreational or educational purpose.

I would like to highlight that most of the model aircrafts does not meet many of the requirements stated in the guidelines such as;

- Manufacturer name, type, model number,
- Copy of Unmanned Aircraft Flight Manual (UAFM);
- Copy of Manufacturer's maintenance guidelines for UAS;
- SIM card slot for an app based tracking (Mandatory for Micro & Mini UA);
- GPS/ INS (with option to GPS tracking and Geo Fencing);
- Detect and avoid capability Return Home option etc.

Hence, my suggestion and comments on the guidelines are as below;

1. Please divide the guidelines as two parts namely **PART A, PART B**
2. Clause 4,5,6,7,8,9,10,11 & 12 shall be grouped under PART A with an introductory paragraph as below;

Part A is applicable for

- a) Unmanned Aircrafts for Commercial use
 - b) Model Aircraft weighing more than 20 kg
 - c) Model Aircraft when flown above 500 feet AGL irrespective of any weight category.
3. Please delete the following clause since this will be covered under Part B
~~5.3.b) Model aircraft operating below 200ft AGL in uncontrolled airspace & indoor UA for recreational purposes only. (Aero modelling activities carried out within the premises of educational institutions will be considered as recreational purposes)~~

4. Please include PART B with an introductory paragraph as below;

Part B is applicable for

- a) Model Aircraft weighing **more than 250grams** and **less than 20 kg** and **operated below 500 feet AGL** in uncontrolled airspace and clear of notified prohibited, restricted and danger areas as well as Temporary Segregated Areas (TSA) and Temporary Reserved Areas (TRA)
- b) Model Aircraft in indoor operations

5. Please introduce new clauses under Part B

Clause 13. ISSUE OF UNIQUE IDENTIFICATION NUMBER FOR MODEL AIRCRAFT PILOT (UINP)

13.1 All Model Aircraft pilot in India will require a Unique Identification Number for Model Aircraft Pilot (UINP) issued from DGCA. The UINP can be granted only to:

- a) a citizen of India above 18 Years of Age; or
- b) a citizen of India above 14 Years of Age under the guidance of UINP; or
- c) Foreign National sponsored or invited by recognized Aero Modelling Clubs or Legal Establishments for events arranged in India. The event shall have prior approval from DGCA.

13.2 Registration shall be done online in the DGCA portal (to be setup for this purpose) with the following details and documents uploaded in the portal;

- a) Name,
- b) Date of Birth
- c) Photograph
- d) Permanent Address and Supporting documents
- e) Email ID for communication
- f) Telephone/Mobile Numbers
- g) Sponsor details and supporting documents in case of foreign national.
- h) Guide Pilot details in case of age between 14 to 18.
- i) Type of Model Aircraft
- j) Common Locations where flying activities are carried out

13.3 The online application made above will be reviewed and approved by DGCA. Upon approval, UINP number will be generated and an email will be sent.

13.4 The Identification plate (made of fire proof material) inscribed with UINP shall be affixed to the UA, to identify ownership of the model aircraft.

13.5 The pilot shall carry the approval while flying the Model Aircraft, which can be verified by local administration any time.

Further, to the above DGCA shall initiate following actions to improve the security

- Establish No Fly Zones in cooperation with state governments and local administration
- Local Administration shall install No fly Zones boards
- Create awareness to the public to report operations of UA in the No Fly Zones

Thanks / Regards