

## Drone Alliance Europe comments on NPA 2021-14

Comment Number	Section Number	Section Title	Page #	Comment
1	AMC & GM to Regulation (EU) 2021-664 2.3.4	The U-space airspace – Article 3	12	Delete “”In fact, most airspace – e.g. countryside away from urban areas and aerodromes—will most likely not be U-space airspace.” It may in fact be that Member States may initially designate less complex airspace in the early implementation period.
2	AMC & GM to Regulation (EU) 2021-664 2.3.9	Network identification service – Article 8	16	Statement that a “full picture of active UAS flights in an area can be provided” does not recognize that network identification is intended to be a tool for providing identification and location of an aircraft and operator by request. It is not intended to provide a composite picture of all existing aircraft operations or to be repurposed for the separation of aircraft.
3	AMC & GM to Regulation (EU) 2021-664 2.3.11	UAS flight authorisation service – Article 10	20	Support the reference to ASTM standard F38
4	AMC and GM to Regulation (EU) 2017.373 2.3.23	Dynamic reconfiguration of the U-space airspace	26	Insert, “as a last resort,” before “the entire deactivation of the airspace.”

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5	GM1 Article 2(6)	Definitions -- Dynamic Airspace Reconfiguration- Short-Term Changes	31	Is there an expected latency for dynamic airspace reconfiguration?
6	GM1 Article 3	Responsibilities in the U-space airspace	32	As a general matter, Article 3 should have a clearer objective to encourage the designation of U-space airspace.
7	GM1 Article 3	Responsibilities in the U-space airspace	32	In (b)(9), what is the definition of “prevalent” in “prevalent meteorological conditions”?
8	GM1 Article 3(1)	Reasons for the Establishment of a U-space Airspace	33	Propose to delete subsection (c). While privacy concerns may be address in U-space airspace, privacy is not a primary reason to establish U-space airspace. Privacy may be accomplished by geographical zones independent of U-space.
9	GM2 Article 3(1)	Airspace Risk Assessment - General	34	Where are the performance metrics defined?
10	GM3 Article 3(1)	Airspace Risk Assessment – Process Phases	35	Stakeholders are involved in this process, but it is not clear from the text how much they can affect the process.
11	GM4 Article #1)	Checklist template	41	Delete “UAS COMS frequencies availabilities, including coverage of 3/4/5G network.”

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12	GM6 Article 3(1)	Other risks	46	<p>Replace (g) with the following text:</p> <p>(g) The main legal reference regarding privacy risk assessment is Regulation(EU) 2016/679 (The General Data Protection Regulation). However, the GDPR applies only to “personal data” as defined tin Article 4(1) of GDPR, not to commercial information, which will generally be covered by national laws. Notwithstanding, a privacy risk assessment should ensure the security of third part commercial data.”</p>
13	AMC1 Article 4	General	48	Response to Q2: Predetermined performance buffers are unable to account for the performance characteristics of UAS.
14	GM1 Article 5	U-space architecture	50	In (b), replace “definition” with “designation”
15	GM1 Article 5	Common information service -- U-Space Architecture	50	<p>In (c), the CIS provider is required to be certified. Is this by the competent authority for I-space, or another entity delegated by the Member State?</p> <p>In (e), would a single CIS provider be a “single point of failure” in the system? There is no statement that CIS is required for the operation. How is availability of this component assured?</p>
16	AMC1 Article 5(2)	Common information service- Timeliness	52	Response to Q3: A low latency number should not accommodate different communications architectures. This should be no less than 10-30 seconds. What is intended to be included in “traffic information data”? Is not that all the information being exchanged?
17	AMC1 Article 6(8)	UAS operators – Contingency Measures and Procedures	54	Is this more about making public contingency measures (e.g., indicating off-nominal routes), or a real-time update from the drone? This section is unclear

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18	GM2 Article 7(2)	U-space service providers –Access to data	55	Why does the USSP need to be able to provide a copy of data about an operator back to that operator?
19	AMC2 Article 7(3)	U-space service providers-- Contractual arrangements between the USSP and the ATS provider	56	Delete (b)(1)(ii) as this information is unnecessary.
20	AMC2 Article 7(3)	U-space service providers – Contractual arrangements between the USSP and the ATS provider	57	Replace subsection (3) with:  (3) the coordination procedures between the USSP and ATS Provider covering the provisions of Article 15(2) and Implementing Regulation (EU) 2021-665 ATS.OR.127 requirement. Examples of scope of data and information shared between the ATS Provider and USSP for different scenarios are provided in GM1 to Article 7(3).
21	GM1 Article 8	Network identification service – General	61	In (a), does height mean altitude of the drone or physical height of the drone?
22	GM1 Article 8	Network identification service- General	62	Delete “and the traceability”
23	AMC2 Article 8(1)	Network information service –Continuous processing	62	Response to Q4 -- This should be less than 10 seconds. That should not be hard to achieve with current technology. Specifically, the NetSPData ResponseTime99thPercental in the ASTM Remote ID standard and the value in both this standard and the ASTM F3411 standard is 3 seconds. This value achieves the latency for the proper functioning of remote identification, and the requirements for proper functioning of the traffic information service should be equivalent in this case.

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24	GM1 Article 10	UAS flight information service -- General	65	Article 10 should have a stronger adherence to existing international standards, such as ASTM F3548
25	GM1 Article 10	UAS flight information service -- General	65	Add "in controlled airspace" for clarity. As written, it could be interpreted as ATC must approve even in uncontrolled airspace
26	GM1 Article 10(2)	UAS flight information service – UAS flight authorisation process	66	In section (a), replace lines 3 and 4 with:  Volume, which is in line with ASTM F3548-21 "Standard Specification for UAS Service Supplier (USS Interoperability," a volume of airspace defined in terms of latitude, longitude, and altitude (such as a circle or polygon with vertical extends) plus a start and end time for the volume
27	GM1 Article 10(2)	UAS flight information service – UAS flight authorisation process	66	In light of revisions to section (1), delete section (b)
28	GM1 Article 10(2)(d)	UAS flight authorisation service – Deviation threshold	67	Replace section (d)( with the text:  (d) Going outside the planned volume should occur with a probability of less than 5% of the flight time as validated by the USSP over time, in line with ASTM F3548-1 "Standard Specification for UAS Service Supplier (USS) Interoperability." This implies that the operational intent definition takes into account UAS operational performance, specifically including Total System Error (TSE), which encompasses operator proficiency and weather conditions.
29	GM1 Article 10(2)(d)	UAS flight authorisation service – Deviation threshold	67	Delete section (e)

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30	AMC1 Article 10(6)	UAS flight authorisation service – Arrangements in case of conflicting UAS flight authorisation requests	69	Replace (b) with the following text:  (b) If a USSP fails entirely and cannot support strategic coordination, the arrangement between USSPs should set service levels and allow other USSPs to take over accepted flight managed by the failed USSP. In that regard, the terms and conditions associated with the flight should incorporate provisions to deal with the specific case.
31	GM1 Article 10(8)	UAS flight information service –Special Operations	70	How does a USSP verify that an operation belongs to one of these prioritized categories? This section describes a “first-come, first-served” approach to airspace planning – see GMC1 Article 10(9), with the exception of “priority” operations. This will need to be adjusted going forward.
32	GM1 Article 11	Traffic information service -- General	72	In (c), does this subsection assume all of this data is available digitally from ATS, or does the USSP need to access additional data (i.e. private ADS-B receivers)?
33	AMC1 Article 13(1)	Conformance monitoring service -- Performance	76	5 second latency for 99% of the time seems to conflict with the general questions in Article 5(2). In addition, this implies a very low latency between the USSP and the control station. Is the intent here to issue the alert but ot have requirements on the reception of that alert?
34	AMC2 Article 13(1)	Conformance monitoring service – Confirmation of compliance	76	Provide this “compliance check” to what entity, and how often?
35	GM1 Article 13(1)	Conformance monitoring service – Non-compliance notification	77	Does “zero or more non-compliance statuses” mean the status of any non-compliance item”? If there is zero non-compliance statuses, why would there be any notification?

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36	AMC3 Article 15(1)(e)	Conditions for obtaining a certificate – Management system— Responsibilities (ATM/ANS.).OR.B.005 (a)(10) of Regulation (EU) 2017/373	80	It is unclear if the management system is more qualitative (general agreement between people) or in terms of actual data sharing. This seems to imply that the USSP has all the manuals for every UAS, but that does not seem to be correct. Please clarify.
37	AMC15 Article 15(1)(e)	Conditions for obtaining a certificate – Personnel requirements—General (ATM/ANS.OR.B.020 of Regulation (EU) 2017/373	85	Delete this section as it is unnecessary.
38	AMC1 Article 15(1)(h)	Conditions for obtaining a certificate –Business plan	89	Delete section (b) as it is not safety related and thus unnecessary.
39	GM2 Article 18(f)	Tasks of the competent authorities – Coordination mechanism -- Phases	93	In (b)(1), replace the comma after “collaboration” insert a period and delete last four lines as unnecessary.
40	GM2 Article 18(f) GM2 Article 18(f)	Tasks of the competent authorities – Coordination mechanism -- Phases	93	In (b)(3), delete the second sentence as unnecessary.

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41	AMC1 SERA.6005 (c)	Requirements for communication, SSR transponder and electronic conspicuity in U-space airspace	107	DAE notes that the SERA amendments related to conspicuity are critical to the integration of drones.