

Archived: Wednesday, 27 November 2019 11:22:15 AM

From: noiseregulation@infrastructure.gov.au

Sent: Fri, 22 Nov 2019 15:17:54

To: Noise Regulation

Subject: Submission to noise regulation review [SEC=UNCLASSIFIED]

Sensitivity: Normal

Comment: Thank for the opportunity to provide feedback on the RPA proposed noise regulation of Drones (section 2.7).

I have provided comments on the following sections and happy to discuss further if required.

As current participate in the Wing drone delivery trial in Canberra, I have a unique perspective which observers may not be able to provide, however my feedback is based on current and potential future drone use & applications.

a)

Restrictions on the number of flights per hour or day may unfairly impact some operators & customers as flights would occur over different directions and flight paths, rather than all following the same flight path. I'd suggest the base of operations for any drone delivery service should be based in a commercial area to avoid residential concerns during the take off and landing phase of the delivery. This consideration seems to be omitted in the proposed regulations.

d)

References international and national regulations, yet sections e) & f) look to regulate from state/territory legislation. In an attempt to future proof what will undoubtedly be new & evolving legislation to manage the increase in drone use and application, all regulations and legislation should be national rather than state/territory/local. Drones will eventually operate cross local and state boundaries (noting that their operators already do). There are many (I would suggest 100's) examples where inconsistent local/state/territory regulations create unnecessary difficulties & non-compliance for individuals, businesses and governing bodies. The examples provided (page 8 & 9) of regulating noise, are not the same as drones as these examples are not transient (Eg. A Dog parking is not crossing state boundaries).

e)

Benchmarking similar noise generating equipment (and it's duration) is an important consideration. This being the case I do not foresee any concerns from the current drone delivery service. It is true the drone noise during delivery hover is louder than overflight travel, however the delivery phases only lasts for approximately 30 seconds. From my experience & location, overhead helicopters and some models of planes are louder than the delivery drones. Also the neighbours blower vac, lawn mower and screaming children are louder (and for longer) than the delivery drones.

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Confidential?: No

submitted via infrastructure.gov.au