Department of Infrastructure, Transport, Regional   November 3, 2020
Development and Communications
GPO Box 594
Canberra ACT 2601
Australia

To Ms. Dale Sheridan,

Please consider this input from ANRA Technologies, Inc. regarding the *Emerging Aviation Technologies Nation Aviation Policy Issues Paper (Sep 2020).*

The paper is comprehensive and clearly articulates a first-step toward a national policy for the management of drones and other emerging technologies for the Commonwealth of Australia. In fact, I suspect other regions will use this document as a framework for their own policy efforts.

While the document certainly stands on its own, we would like to share a few thoughts based on our industry perspective working with various government and commercial entities providing research and operational UAS Traffic Management (UTM) technology and services.

- **UTM Certification**. UTM will provide a critical component for safe and efficient movement of people and cargo. Certification of UTM technology and the services provided will require engagement from stakeholders to ensure clearly identified roles and responsibilities for all actors within the UTM ecosystem. This will be necessary to ensure appropriate levels of compliance and assignment of liability.

- **Data Access.** As mentioned in the document, privacy is an important policy consideration on many levels. Access to data collected within a UTM system is a significant issue and requires stakeholder engagement to ensure consumer, industry, and government interests are represented regarding accessing the vast amounts of data that could be collected and stored.

- **Weather.** Suggest more consideration be given to weather and its impact on operations, both from a technology and policy perspective.

- **Spectrum Management**. Frequency spectrum management is mentioned within the eVTOL section but is not emphasized elsewhere. Recommend placing more emphasis on Spectrum as this will continues to be a significant policy issue for all autonomous air operations.

- **ATM Engagement.** Air traffic management has developed over time and contributes to safe and efficient global operations. Most in the drone industry rightfully concede that drone systems need to adapt to legacy air systems, however, the ATM community must also begin to evolve to

facilitate new and emerging technologies as they have successfully demonstrated for many years. The UTM-ATM relationship should not just be primarily a push (UTM), but also pull (ATM). Policy should facilitate greater engagement from the ATM community to help foster a safe and efficient system for all airspace users.

We appreciate the opportunity to comment on this policy paper and applaud the thoughtful approach for a national policy. ANRA looks forward to supporting the Commonwealth in a collaborative pursuit of policy and initiatives for emerging aviation technologies.

Sincerely,

Brent Klavon
VP Operations
ANRA Technologies, Inc.