

Suite 6.01, Level 6
243-249 Coward Street
Mascot NSW 2010

T. +61 2 8307 7777
F. +61 2 8307 7799
E. ausalpa@aipa.org.au

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By Electronic Transmission

Mr Darren Angelo & Mr Kim Jones
Joint project leaders for Part 139 PIR Project
Civil Aviation Safety Authority
GPO Box 2005
CANBERRA ACT 2601

Email: Darren.Angelo@casa.gov.au; Kim.Jones2@casa.gov.au

Dear Darren and Kim,

Re: Visual Approach Slope Guidance (VASG)

Firstly, AusALPA would like to thank you for providing us with the opportunity to provide comment and feedback with regards to the current regulation requiring jet aircraft to have Visual Approach Slope Guidance (VASG) at an aerodrome. We are cognisant that the installation of ground based equipment places a financial burden on the aerodrome operator and that a pragmatic approach to this is required by the industry.

It is AusALPA's view that any requirement for a VASG should be separate from the type of propulsion system the operating aircraft uses. This current methodology of discriminating between requirements can be largely considered outdated and no longer applicable, particularly considering the size and performance characteristics of many turboprop aircraft.

It is our firm recommendation that the requirement for a VASG remains within the Part 139 rule set and not the various operating Parts, since the aerodrome operator is accountable for their own infrastructure. Scattering aerodrome requirements throughout the operating Parts will create an unnecessarily complicated scenario of having to differentiate one aerodrome requirement from another as opposed to ideally having a single point of reference.

The majority of operators require their aircraft to be "Approach Stable" by 1000ft AFE for an instrument approach or latest by 500ft AFE, dependant on fleet type and/or meteorological conditions. This criteria has been introduced to prevent runway excursions, whilst vertical guidance is there to prevent CFIT accidents (such as Lockhart River).

The most crucial phase following the completion of an instrument approach procedure is visual reference to the touch down zone.

We recommend that the MOS 139 require an aerodrome to have a VASG for any Regular Passenger Transport (RPT) aircraft over thirty (30) seats. This requirement should also apply if an aerodrome has an instrument approach procedure established.

We are also concerned about the seven (7) day exemption and the difficulties it places on flight crew where an aerodrome has an unserviceable VASG. It has been noted by our membership that the exemption has been misused by some aerodromes to continually postpone dealing with the VASG unserviceability, rather than rectifying it within the mandated grace period. We support the intention of the exemption to provide an avenue for temporary outages, but not for sustained long term unserviceability.

Finally, there is the issue of suitability and sustainability of a VASG at aerodromes which do not usually cater for RPT/IFR movements. Any sort of operation into an aerodrome which doesn't have VASG by aircraft that would otherwise require a VASG would obviously require a risk analysis to be conducted and some form of exemption sought by the operator. We are not opposed to exemptions, as long as they're used as interim stop gaps and not long term solutions. AusALPA is aware that our industry colleagues at the aerodromes will have serious concerns regarding financial implications; however it is our position that financial benefit is balanced with the safe, efficient and smart operation of both the aerodrome and aircraft.

If you require any further information with regards the above comments please do not hesitate to contact me. Thank you again for offering us the chance to lead the discussion with regards to visual slope guidance requirements.

Yours sincerely,



Alexander Dunbar
AusALPA AGE Portfolio Chairman & IFALPA AGE Committee Vice Chairman

Tel: 61 – 2 – 8307 7777
Fax: 61 – 2 – 8307 7799
Mob: +61 422 557 557
Email: alexander.dunbar@afap.org.au