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To,

Shri Lalit Gupta
Joint Director General of Civil Aviation
O/o The Director General of Civil Aviation,
Techinical Center, Opp. Safdarjung Airport,
New Delhi 110003

Date: 21st May' 2016

Petition

By **Western Zone-Aero Modellers Team - India**

Regarding: Air Transport Draft Circular - office of DGCA

Subject: Guidelines on obtaining UIN & Operating of civil UAS

Introduction:

We are writing to you as a group of clubs in Western India (Addendum A) who are actively engaged in the sport of aeromodelling. The signatory clubs as per attached list comprises of around 480 members who practice, support and promote the hobby of RC model flying. Besides **Wings India**, a leading, non-profit making, Mumbai based organisation, and a member of **Aero Club Of India**, is actively associated with nine educative institutions (Addendum B) in Mumbai with a count of over 29,000 students where we are instrumental in and plan to impart training in the field of aviation through Aero Modelling programmes.

Our Clubs have been regularly organising National & International shows on Aeromodelling as well as participating in reciprocating countries. Expert Flyers from world over visit us for such events.

Paradigm Of Aero Modelling in India

Aeromodelling as a hobby has been prevalent in our country since almost 40 years. It is being practiced by enthusiasts, hobbyists, institutions and defence organizations for recreational, educative and development purposes by people of all ages from different walks of life. Supported by the increasing levels of literacy, awareness and affluence in our country, it has grown multifold, in the last decade. **It is conservatively estimated that there may exist more than 22, 000 model fliers in our country ranging from young children to matured adults**. It serves as means of learning, recreation, entertainment, and a sense of exhilaration for all like minded people, who love the art of flying. It is no longer a prodigious sport, limited to a few, but is fast becoming accessible to a whole diaspora of our society to learn and benefit from.

While your policy draft addresses the entire scope of civil Unmanned flights, our submissions are concerned exclusively with the activity of aero modelling when practised as a sport, hobby, for educative or recreational purposes. Any other purposes, be it photography, commercial, surveillance, vigilance, administration or defence; is not our subject matter and we have no comments to offer.

Definition- Model Aircraft & Applicability of Rules Thereon

Under Para 2 of the proposed draft policy published by DGCA, Model Aircraft has been defined UA (Unmanned Aircraft) without payload for recreation purposes only, UA (a constituent of UAS) by itself is a very wide term that covers any or all unmanned aircrafts flown by remote control for varied applications, be it commercial, administrative, defence etc. As a result all conditions,by default, applicable to any type of UA's, canbe deemed to be applicable to model aircrafts (for recreation purposes) also, unless specifically exempted. If this be the case, as a hobby, aero modelling is sure to die its own death suo motto. While we will attempt to elaborate in our subsequent presentation the conflicts arising out of the enumerated proposals vis a vis RC model flying as a hobby, we wish to refer to the existing International practices as prevailing with regard to the subject matter.

The **International Commercial Aviation Organisation (ICAO) vide their circular ref. 328 AN 190** on the matter of **Unmanned Aircraft Systems (UAS)** has in Chapter 2 subpara 2.4 specifically excluded Model Aircrafts (for recreational purposes) from the preview of the 'Chicago Convention' and left it upon the Independent National Governing Bodies to regulate the same as per their suitability. Accordingly Different Aviation Authorities have dealt with the matter differently.

In India, their already is in existence, a guideline issued in July 2010, by the 'Aero Club of India', the apex body for aero sports. After an exhaustive study, they have defined Aeromodels and their classifications vide para 2 & 3. These represent the existing norms being followed by the aeromodeling fraternity in India, currently.

Similarly, Federal Aviation Administration (FAA) authority of U.S. Department Of Transportation after detailed study, as recently as, 11th January 2016 have issued a comprehensive Advisory circular # 91-57A for model aircraft operating standards exempting the same, from the preview of normal rules applicable to other forms of UA, UAS usage, and prescribing, on a stand alone basis, a separate set of simplified rules applicable for model aircrafts only.

In short Model Aircrafts–for Hobby & Recreation purposes, though may fall in the general category of UA's however the rules governing the operation of the same may differ from other types of UA's and therefore should be formulated separately. Strict Regulatory Adherences required for commercial or other types of UA's /UAV's,in situ, if imposed on Hobby, recreational flying,are certain to strangulate the sport.

It is therefore desirable to form an independent set of rules applicable specifically for Model Aircrafts to avoid any confusions with the scope of UA's /UAS in General. Alternatively the policy within its existing scope should provide for complete exemption for Model Aircrafts when operated in compliance with a given set of simplified rules framed exclusively for Hobby and recreation flying. We have taken liberty to suggest a set of rules governing the flight of model aircrafts for hobby / recreational purposes. These are attested as Annexure 1. They represent our submissions, which if acceptable, can be appended to the proposed policy on UA's / UAS as applicable only to for model aircrafts.

<u>Types of Model Aircrafts</u>

Contemporary RC Model Aircrafts are generally of following Types:

A. Fixed Wing – Powered or Non-powered

- Gliders- including chuck gliders


- Fixed Wing aircrafts of various sizes used as park flyers built out of foam or similar light materials, Trainers and intermediates –usually powered, Mid and scale sized aircrafts used for serious hobby /recreational flying – single or multi engine.


- Model Aircrafts with Miniature jet propulsions – advanced level. Higher flying speeds relative to Gliders& Electric / Gas engines.


- Do not require auto navigational aids for flying, for hobby / recreational purposes.
- Flown within line of sight

B. Helicopters – Powered

- Of all shapes and sizes – used by children for fun flying as well as larger scale models for hobby / recreational flying – indoor and outdoors.

- Do not require auto navigational aids except Gyros, for hobby / recreational purposes.
- Flown within line of sight.

C. Drones, Multi copters & FPV's

- Small models mostly used as toys for children, used for fun flying mostly indoors.

- Medium to Larger size multicopters used outdoors for hobby / fun flying and educational purposes.

- Photographic applications known among hobby flyers, for commercial purposes also.

- Usually flown with semi automatic or auto navigational equipment since they are often essential for flight control.

- May be used, within limitations, for out of sight operations with preset waypoints

Until recently, model flying was highly respected and looked upon as intelligent and creative sport worldwide. However, with the advent of the Drones, FPVs and the Quad Copters the perception of model flying started to change in various quarters. The precision and the flight characteristics, of such machines, suddenly invoked a plethora of other possible applications, beyond hobbies, into the world photography,commerce, vigilance and other administrative roles. It also raised questions about safety, public privacy and possible threats to society. So, came the need to relook and formulate fresh regulations in the interest of safety and security. However, unfortunately entangled in these controversies, the good old form of conventional aeromodelling, as it used be in the yester day's, got inevitably drawn into and seems to have become a victim of circumstances.

Our contention is that 98% of the sport of aeromodeling in our country, as existing,relates to the age old traditional ways of model flights i.e. by fixed wing aeroplanes or helicopters. The mechanics and the nature of their flights are grossly differentfrom the way the way the Drones, FPV's or quadcopers fly. In no way do fixed wing model planes posses the versatility and capability to inflict any significant damage when used as scale models for hobby/recreation purposes. On the other hand if regulatory standards designed for drones, FPV's or quadcopters are applied to fixed wing model aircrafts or helis they will certainly sound the death knells for hobby flying.For e.g the obligations in para 10.23 (of the

proposed draft policy published by DGCA,) cannot possibly apply to recreational RC fixed wing / heli model crafts. There is neither the requirement nor feasibility. **Therefore if desired, different sets of rules may be framed for either types of the Model aircrafts or the minimum functional constrains / requirements of each type should be incorporated in a combined set of rules**. The subject matter is being explained subsequently vide our interactions with the text of the proposed policy.

Now, for the sake of better understanding, we wish to submit our following remarks and comments with reference to context of the proposed draft policy published by DGCA on the Guidelines for UIN and UAOP for all Civil Unmanned Aircraft Systems (UAS) enclosed as Annexure 2.

Prayer

It is requested that our submissions be considered on their merits without any prejudices and with a view to encourage and promote the hobby and sport of aeromodeling.

The importance of 'Aero Modelling' per say, cannot, and should not be under estimated. It contributes substantially to the nation, in terms of knowledge and motivation in the field of Aviation. India as a Developing nation, can ill afford to miss on this opportunity. More so ever,in the science of aviation, we have been a late starter, and we have a long way to go. Let us not create barriers of suspicions and bureaucracies. Let us unshackle our youths to develop and display their talents without too many restraints and excessive state policing. Fear cannot become the basis of our lives. We have to flourish as a free society. No doubt, it is the duty of our guardiansto provide us safety and security, but if that becomes incumbent on our very growth, development & excitement of life, it is a very high cost to pay.

Yours Sincerely,

President – Wings India
(Also on behalf of Associates Aeromodellers of Western Zone – India)