

Carr Withall, Chairman of the BGA's Airspace Committee writes:

The CAA is proposing that ALL aircraft must be fitted with a transponder to fly in all types of airspace within the UK. These proposals will affect every glider pilot and glider owner and will impose considerable extra cost to our sport. Please read the following short article and download and respond to the consultation document from the CAA web site.

TRANSPONDERS: CAA Partial Regulatory Impact Assessment.

The CAA has issued a proposal to amend the Air Navigation Order 2005 "for the purpose of improving the technical interoperability of all aircraft in UK airspace." Despite the bland title, the subject of the proposal is the fitting of transponders into all aircraft, including gliders.

The full document can be found at www.caa.co.uk/dapconsultations together with the response document. The document is very comprehensive and detailed and is worth reading.

Following a mid air collision over India in 1996, ICAO proposed that all aeroplanes be equipped with an altitude reporting transponder by January 2003. Note that this ICAO recommendation only referred to aeroplanes, not to all aircraft. Because of the potential for interference to some radar equipment from the classic 'old' transponders, the UK CAA chose not to implement this ICAO standard.

The introduction of new SSR Mode Select (Mode S) technology ground stations will overcome this problem. All ground stations in the UK will be Mode S equipped by 2011/12. With this in mind, the CAA is now proposing that transponders be fitted to all aircraft operating in all parts of the UK airspace, not just in 'controlled airspace'. The UK is alone in proposing transponder use in **all** airspace.

As there is not currently a suitable transponder available for unpowered aircraft, there will be a temporary exemption from the proposals for gliders and un-powered aircraft until such a Low Power Self contained SSR transponder (LPST) is available and proven. There may also be exemption for training gliders confined to the vicinity of airfields.

The BGA does recognise that there are safety benefits to be gained by carrying a transponder when flying in controlled airspace. The carriage of a transponder should also remove any objections to providing clearance to enter Class C or D airspace – ATC units are always telling me that "if only your gliders had transponders." There will also be a safety benefit when RAF low flying aircraft and training aircraft are fitted with a collision warning system (CWS) but this is some years away yet. **We certainly do not agree that transponders should be required in all UK airspace.** The pan-European airspace body Eurocontrol states where the carriage of a transponder is already required: they are not required in Class E, F or G airspace.

The capital cost of transponders will be not inconsiderable and we believe that the annual cost of checking the transponder may well be considerably higher than the estimate given in the CAA proposal document. Owners will also need to purchase a licence for the transponder. Apart from the cost, there are still many unanswered

practical questions: the positioning of the aerial is important and still has to be considered by glider manufacturers; installations will have to be performance checked and certified; the possible radiation risk to pilots has also to be considered; and so on.

What is happening in other European countries?

Other European states are introducing Mode S to aircraft operating under VFR rules. Germany, which has six times more gliders than the UK, is mandating transponders only in controlled airspace and in TMZs (Transponder Mandatory Zones). TMZs are zones covering less busy airports. France is applying the requirement in 2009 in the North East part of France (where Mode S radar is installed), again only in controlled airspace and TMZs. This requirement will extend to the rest of France, again only in controlled airspace, when the roll-out of Mode S ground radars is complete.

Please download and read the CAA document from www.caa.co.uk/dapconsultations. When you have read the document, we urge you to respond, either as a club or as an individual.

The BGA will be formulating their response and this will be published on the BGA web site by 31st July.

Carr Withall

Chairman BGA Airspace Committee

It will be helpful if any individual, BGA club, or gliding business responses are copied to the BGA office at office@gliding.co.uk.