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BGA STATEMENT TO CAA ELECTRONIC CONSPICUITY WORKING GROUP

The British Gliding Association, representing 80 gliding clubs and their approximately 7000 full flying members operating some 2300 aircraft in the UK is pleased to participate in the Electronic Conspicuity Working Group. Its representative volunteers have attended its meetings and reported on its proceedings. We are interested in the issues discussed and welcome the approach of voluntary adoption of electronic conspicuity technologies driven by the benefits they bring to pilots rather than regulation.

However, we think the time is right to reiterate the BGA's position on electronic conspicuity that we have communicated in the past. An adopted electronic conspicuity standard must work for the whole population of aviators with their diverse operating patterns, not just a subset of them. You will be aware that we are mining the data generated by currently implemented technologies to quantify the volumes of traffic that gliding represents, but it is already clear that gliders account at times for a very significant proportion of aircraft in flight. The pilots of these aircraft must be able to benefit fully from any proposed solution.

Specifically, the gliding community will be only be able to support a technology that at least:

- Provides demonstrated accurate collision warning in the close manoeuvring environment typically experienced by gliders,
- Has a low rate of false negatives (missed warnings leading to compromised separation) and false positives (false warnings leading to loss of confidence in the technology and potentially switching it off),
- Is intelligent enough to avoid warnings in non-threat situations such as aerotow combinations and parked aircraft,
- Has low enough power consumption to be used without the installation of additional batteries,
- Can be permanently installed in EASA aircraft without disproportionate cost (equipment, maintenance/calibration, regulatory) and bureaucracy
- Is compatible with glider airframes (no external antennas, low radiation density in the cockpit).

The Working Group will be aware that many UK gliders are already equipped with devices meeting these criteria. While we would welcome the addition of interoperability, we would not be able to support a proposal that compromised the criteria above. We anticipate that such interoperability would allow gliders to be sensed:

- for collision warning by other aircraft (other general aviation, commercial air transport, military and UAVs),
- by ground based systems to enable frictionless access to airspace in future airspace configurations.

The BGA and its volunteer experts are of course available to the CAA and its advisers to ensure that there is no misunderstanding about these requirements and to evaluate the performance of proposed solutions against them. We look forward to this vital work.

Pete Stratten
Chief Executive Officer