

#1

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, May 14, 2021 11:55:01 AM
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IP Address: [REDACTED]

Page 1

Q1 **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Mark

Q3

Email address

Q4

Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

I fly remote control planes and gliders

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

Page 3

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

First off there are already rules in place to be able to prosecute an individual who is flying carelessly. Registration is not going to stop idiots All that does is penalize The true enthusiast.from experience of flying for over 5years at a local park we have had no property damage or accidents where a person has been injured.The main problem is with The likes of noel lemming etc selling drones to the public..where as a model shop can and do give customer the important information of safety and responsibility for handling a remote control plane drone and provide options like flying club or put them in touch with a trainer to help them

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

No,
Please comment::
As above

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

No,
Please comment:
First off problems? Its easy to see why we are even talking now like I said models should be sold by model shop. Then all necessary information is given and follow up

Q10

Are there any other problems and opportunities you can think of?

Not really

Q11

Do you agree with the proposed order of implementation of the measures?

No,
Please comment:
As above

Page 4

Q12

Should drones have their own standalone Rule Part?

Yes,
Please comment:
We already have them in place now

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

No ,
Please comment:
It's fine I know about that so do my mate's that I fly with

Q14

Should we change the requirement to gain consent to fly above property?

Yes – relax the consent provision in another way,
Please comment:
Easy minimum height of 100metres no hover or circle flight directly from above

Q15 **Yes – relax the requirement in another way,**
Should we change the requirement to gain consent to fly above people?
Please comment:
As above

Q16 **Other (please specify):**
If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?
100

Q17
Are there any other major Rules changes we should consider?
Yes if our planes get shot at or damaged by dogs as mine has or anything else we should be able to file a claim against the individual responsible

Q18 **No**
Are there any minor changes to the Rules that would make them easier for you to understand?

Q19
What do you think of the proposed minor Rules changes?
No

Q20
Are there any other changes we should consider?
No

Page 5

Q21 **No,**
Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?
Please comment:
This is a hard One as DJI drone is really self flying..plane glider most can't fly so 101 is pointless no kid buying DJI drone from Noel lemming etc will care about that..as I have said I've been flying 5 years taught by other pilots at The feild for me that's the best way

Q22
What impact would a basic pilot qualification likely have on you?
None I'd pass no worries I already checked it out on line passed.my point is it's not The drone or most pilots its the accountability from seller's of drones to provide safety and teach to create a good safe pilot

Q23

Electronic/online theory test

What format should this test take?

Q24

Yes, 16 years

Should there be a minimum age for basic pilot qualification?

Q25

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

No,

Please comment:

Why are you guys trying to get money us we work hard All week just so we can fly our planes at a local park safely.why punish The Good because some young self absorbed person shits on the rules when you have already in place a means to prosecute

Q26

Is there any other special authorisations you would like to see?

No

Page 6

Q27

Should we introduce the proposed drone registration system?

No,

Please comment:

This is the American crap why are we bringing it here as I have said no incidents flying over 5 years this is all geared to get money why

Q28

What impact would drone registration likely have on you?

Shit loads weight for a start could make a model dangerous as cg out and why bicycles are not registered and heaps of accidents have happened there answer me why

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Crap money spinner

Q30

Should there be a minimum weight threshold for registering a drone?

Yes, but with a different weight as the threshold ,

Please comment:

5kg

Q31

Should certain drones not need to be registered (select all that apply)

Yes, others (please specify below),

Please comment:

Local parks not in flight zones

Page 7

Q32

Should we introduce remote ID?

No,

Please comment:

Why? Push bikes aren't are they any safer

Q33

What impact would remote ID likely have on you?

I would sell my gear

Page 8

Q34

Should we consider introducing geo-awareness?

No,

Please comment:

Why? Rules are already in place

Q35

What impact would geo-awareness likely have on you?

It's an freedom taken away from me at the moment I just enjoy a flight a my park in the weekend and catch up with my mate's flying too and go home I don't need bullshit rule's trying to cypher cash out of my hard earned money to give it to lazy b@#tards who doesn't even fly a model themselves

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Not happy about this crap get a life and leave us alone you already have rules in place to prosecute.we are a tiny country not America 14 million in One city.

Q37

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

#2

COMPLETE

Collector: Web Link 1 (Web Link)
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IP Address: [REDACTED]

Page 1

Q1 **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Garry Grenfell

Q3

Email address

[REDACTED]

Q4

Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

I fly multirotors and fixed wing recreationally.

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

I agree with the spirit of the document.

With registration I think owners of recreational aircraft should be registered and use their number on their aircraft because usually they will have multiple aircraft flying one at a time.

Commercial aircraft should have individual registration numbers. Companies may have many aircraft and pilots.

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

No,

Please comment::

Yes as regards education. People can learn the rules. However there will always be people who choose to be non compliant. These people will continue to operate outside the law because they can.

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

Yes, with changes

Q10

Are there any other problems and opportunities you can think of?

Humans being human there will always be non compliance.

Q11

Do you agree with the proposed order of implementation of the measures?

Yes

Page 4

Q12

Should drones have their own standalone Rule Part?

Yes,

Please comment:

Multi rotors should be separate from fixed wing aircraft. While both classes fly they do so in completely different ways. They also may have completely different control methods. Multi rotors are inherently unstable and require flight controllers while fixed wing are inherently stable and do not require a flight controller.

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

No

Q14

Should we change the requirement to gain consent to fly above property?

Yes – use 'safe distances' as an alternative,

Please comment:

An altitude of 30 meters (100 feet) should be suitable in most cases.

Q15

Should we change the requirement to gain consent to fly above people?

Yes – use 'safe distances' as an alternative,

Please comment:

An altitude of 30 meters (100 feet) should be suitable in most cases.

Q16

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

30 metres

Q17

Are there any other major Rules changes we should consider?

Beyond visual line of sight for part 101. With recent improvements in equipment, better cameras, gps, reliable flight controllers etc, the ruling on this might be relaxed.

Q18

Are there any minor changes to the Rules that would make them easier for you to understand?

Respondent skipped this question

Q19

What do you think of the proposed minor Rules changes?

Respondent skipped this question

Q20

Are there any other changes we should consider?

Respondent skipped this question

Page 5

Q21

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Yes,

Please comment:

This is education rather than qualification. The more knowledge a pilot has the less likely they are to be a problem.

Q22

What impact would a basic pilot qualification likely have on you?

It might add to the one I already have.

Q23 **A practical examination of skill and a paper based written theory test (at a provider)**
 What format should this test take?

Q24 **Yes, 16 years**
 Should there be a minimum age for basic pilot qualification?

Q25 **Yes**
 Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26 **Respondent skipped this question**
 Is there any other special authorisations you would like to see?

Page 6

Q27 **Yes, with changes.**
 Should we introduce the proposed drone registration system?
 Please comment:
 Commercial drones as per document. A company may have many drones and pilots. Recreational drones, register the owner and use their registration number on all of their aircraft. An owner can only fly one at a time.

Q28 **Respondent skipped this question**
 What impact would drone registration likely have on you?

Q29
 What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?
 It should work if kept simple. (Some of us are old and feeble)
 Please remember not all of us have access to computers. Perhaps keep paper registration as an option.

Q30 **Yes, but with a different weight as the threshold ,**
 Should there be a minimum weight threshold for registering a drone?
 Please comment:
 300 to 500grams.

Q31 **Yes, drones flown solely indoors,**
 Should certain drones not need to be registered (select all that apply)
Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)

Page 7

Q32

Should we introduce remote ID?

No,

Please comment:

Remote ID will not enhance the situational awareness of drone operators by itself. This is learned through appropriate training and education.

Q33

What impact would remote ID likely have on you?

I don't know. It might enable me to do a lot more or it could stop me flying altogether. It depends on what is implemented and how.

Page 8

Q34

Should we consider introducing geo-awareness?

I don't know,

Please comment:

Geo fencing has been in place with DJI since 2015. The technology is in place in a lot of machines. Perhaps the answer is fine tuning the software?

Q35

What impact would geo-awareness likely have on you?

Respondent skipped this question

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Respondent skipped this question

Q37

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

Respondent skipped this question

#3

COMPLETE

Collector: Web Link 1 (Web Link)
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IP Address: [REDACTED]

Page 1

Q1 **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Chris Jackson

Q3

Email address

[REDACTED]

Q4

Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

Flying UAV commercially for 12 years, model aircraft for 35. NZ Representative team member at Drone Worlds 2016. Flown for UN disaster relief team, and FAA BVLOS trials. Ex X-Craft Chief pilot, ex Aeronavics Operations Manager and Chief engineer. CAR101.202 approved person/organisation. UAVNZ executive. MFNZ President. Ex Air NZ senior aircraft engineer.

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

The rules do require updating, there have been many known faults with them for previous years.

Basic pilot qualification is a good idea, provided it is done with effective education program.

Drone registration achieves nothing for safety, it might provide some data and income however.

Without enforcement personal nothing will be enforced, tech to do it is irrelevant. Remote ID tech is fairly poorly understood within the document and overlooks many technical issues.

Geo-Awareness is better described as an updated and corrected airspace map, ideally available to third parties via API.

Fix the known issues with the rules, resource CAA to effectively educate and enforce.

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

No,

Please comment::

The problems are not well understood in the document, and whilst in the extreme case of a RPAS Vs an airliner wont be good, the odds of it happening are astronomical low (once in 400 years). Other incidents have all been proven to be low risk, and low consequence. The solution is education and the regulator being engaged with the sector and community.

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

Yes, with changes ,

Please comment:

The basic qualification has merit, provided its done with an education program that works. Airshare is a mess, an alternative that has correct information and provides access to the CTR will solve many issues. It needs to feature all airspace, at least that below 400ft.

Q10

Are there any other problems and opportunities you can think of?

Training standards for both 101 and 102 are extremely variable, with numerous examples being made to CAA.

Without a standardised syllabus and minimum course length, an incident is going to occur.

CASA has numerous documents around training standards, eg <https://www.casa.gov.au/sites/default/files/advisory-circulars-101-01-remotely-piloted-aircraft-systems-licensing-operations-annex-a.pdf> and New Zealand CAA has nothing. This lack of guidance material is causing a very large rift between the good and bad CAR101.202 and Part 141 organisations standards.

Q11

Do you agree with the proposed order of implementation of the measures?

No,

Please comment:

Order is irrelevant.

Q12

Should drones have their own standalone Rule Part?

I don't know,

Please comment:

If it remains CAR101, and the various manned aspects within CAR101 move elsewhere, it may have merit.

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

No ,

Please comment:

4km works well, making it more complex will cause confusion.

Q14

Should we change the requirement to gain consent to fly above property?

Yes – remove the consent provision completely,

Please comment:

Its unenforceable and does not mitigate risk the way it was intended.

Q15

Should we change the requirement to gain consent to fly above people?

Yes – use 'safe distances' as an alternative

Q16

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

30 metres

Q17

Are there any other major Rules changes we should consider?

101.3 - Updated Definitions, including active, aerodrome boundaries (water aerodrome boundaries)

101.202 - Documentation around the process of 101.202 application, conditions on its approval, responsibilities, privileges, the requirement of a Fit and Proper primary person.

Further expansion and documentation of the rule, such as training syllabus or aircraft standards, could be covered under a future Advisory Circular or other document external to CAR101.

101.202(3) should be removed, any airspace user should be able to request a NOTAM, this would help improve effectiveness of the NOTAM system.

Essentially this would result in a Part 149 "lite" existing internally to CAR101, aligning with ICAO Model Regulation.

101.205 - Requires clarification and simplification

101.209 - Removal of the requirement for an observer flying FPV when shielded

101.211 - Removal of "indoors" as its irrelevant if shielded.. and turn the lights on.

Q18

Are there any minor changes to the Rules that would make them easier for you to understand?

Yes,

Please comment:

Many numerous tweaks the fixes require implementation, including the ACs.

Q19

What do you think of the proposed minor Rules changes?

Respondent skipped this question

Q20

Respondent skipped this question

Are there any other changes we should consider?

Page 5

Q21

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Yes, with changes ,

Please comment:

24.99 kg with an online test is absurd and will result in people getting hurt! The current limit of 15kg is a high limit for someone with a very low level qualification.

Q22

What impact would a basic pilot qualification likely have on you?

Nil

Q23

What format should this test take?

Other (please specify):

Practical examination and oral test, backed with online theory course.

Q24

Should there be a minimum age for basic pilot qualification?

No

Q25

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Yes,

Please comment:

They are not special authorisations...

Q26

Is there any other special authorisations you would like to see?

Respondent skipped this question

Page 6

Q27

Should we introduce the proposed drone registration system?

No,

Please comment:

Perhaps annual reporting of sales from retailers is a better option, will provide better statistical value.

Q28

What impact would drone registration likely have on you?

Respondent skipped this question

Q29

Respondent skipped this question

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Q30

Yes, but with a different weight as the threshold

Should there be a minimum weight threshold for registering a drone?

Q31

Should certain drones not need to be registered (select all that apply)

Yes, drones flown solely indoors,
Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites),
,
Yes, others (please specify below),
Please comment:
All RPAS that are less than 15/25kg.

Page 7

Q32

Should we introduce remote ID?

No,
Please comment:
Its not feasible and poorly considered.

Q33

What impact would remote ID likely have on you?

Respondent skipped this question

Page 8

Q34

Should we consider introducing geo-awareness?

I don't know,
Please comment:
An updated digital airspace map would be great, removing the commercial aspirations by introducing something with government control would be useful to the industry.

Q35

What impact would geo-awareness likely have on you?

Very little

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Greater community/stakeholder engagement, and technical knowledge, is required by MOT and CAA before considering large changes to the the regulatory system.

The document talks about improving the social license of RPAS, but then references Gatwick and "drone operators dont know the rules" etc, which reads very hypocritically.

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

PROACTIVELY RELEASED BY
THE MINISTRY OF TRANSPORT

#4

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, May 17, 2021 8:20:46 AM
Last Modified: Monday, May 17, 2021 11:35:25 AM
Time Spent: 03:14:39
IP Address: [REDACTED]

Page 1

Q1 **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Evan Wright

Q3

Email address

[REDACTED]

Q4

Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

Recreational plus business. I fly the drone for the local District Council

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Support the recommended changes.

Q8

Yes

Do you think the proposed series of measures would help achieve the desired objectives?

Q9

Yes

Do you think the proposed series of measures would address the problems and opportunities identified?

Q10

Are there any other problems and opportunities you can think of?

I think that there is opportunity to mandate that retailers of UAVs are required to notify CAA/NZTA of the sale of an aircraft or system. This would "prewarn" the agency of either a new platform or operator entering the market. It also lets the new owner/operator know that there are ongoing obligations with respect to CAA/NZTA e.g. training, licensing etc.

Q11

Yes,

Do you agree with the proposed order of implementation of the measures?

Please comment:

Some of the measures could possibly be implemented concurrently e.g. qualification and registration

Page 4

Q12

Should drones have their own standalone Rule Part?

Yes,

Please comment:

Have a single source of information without the requirement to refer to multiple CARs

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

Yes,

Please comment:

The layered airspace arrangement is supported but getting the required level of knowledge into part time recreational users may prove difficult. Would areas be asymmetric around an airfield to take into account circuit direction. Could this prove difficult to administer.

Q14

Should we change the requirement to gain consent to fly above property?

Yes – remove the consent provision completely,

Please comment:

Under Part 101 it can take considerable time to "door knock" all properties under an intended flight path to get the occupiers approval. This can be seen as a negative by an operator so they ignore the requirement to obtain consent.

Q15

Should we change the requirement to gain consent to fly above people?

Yes – relax the requirement in another way,

Please comment:

Different events involving people have different contexts. For example, the risk of flying over people in a Christmas Parade has different safety requirement to flying over sparsely populated park areas. As such the operator has to make a subjective call as to the risk and their ability to operate safely. How this is achieved is difficult to legislate for. Placing the onus on the operator seems to be the most logical thing.

Q16

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

10 metres

Q17

Are there any other major Rules changes we should consider?

Respondent skipped this question

Q18

Are there any minor changes to the Rules that would make them easier for you to understand?

Yes,

Please comment:

Generally the language being used must acknowledge that the reader may not have a deep understanding of aviation so any terms must be in plain language. An example is flying within 4km of an aerodrome. Does this include topdressing strips or private airfields not listed in the AIP. Define an an aerodrome.

Q19

What do you think of the proposed minor Rules changes?

Good

Q20

Are there any other changes we should consider?

No

Q21

Yes

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Q22

What impact would a basic pilot qualification likely have on you?

I would need to formally qualify but I don't see that as a major obstacle to flying

Q23

Electronic/online theory test

What format should this test take?

Q24

Yes, 16 years

Should there be a minimum age for basic pilot qualification?

Q25

I don't know

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Is there any other special authorisations you would like to see?

Para 154 - Who would be infringement officers and how would they be trained and qualified to issue infringement?

Page 6

Q27

Yes

Should we introduce the proposed drone registration system?

Q28

What impact would drone registration likely have on you?

It would be an additional step and cost of operating but as it would only have to be done once its not a problem

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

A digital platform is the way to go. It could tie in with the record of sale from a retailer therefore ensuring that the aircraft is actually registered. Consideration needs to be given to operators who fly the aircraft but don't own it i.e. fly as a role in their occupation. Who is the registered owner?

Q30 **Yes, with 250 grams as the weight threshold**

Should there be a minimum weight threshold for registering a drone?

Q31 **Yes, drones flown solely indoors,**
Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)

Should certain drones not need to be registered (select all that apply)

Page 7

Q32 **Yes,**
Please comment:
Some areas of the country still dont have good WIFI coverage therefore what ever system is introduced needs to be able to operate independently of WIFI.

Should we introduce remote ID?

Q33
What impact would remote ID likely have on you?

Its an additional cost in buy/retrofit but its a one off cost so no big deal.

Page 8

Q34 **Yes**
Should we consider introducing geo-awareness?

Q35
What impact would geo-awareness likely have on you?

Would be able to comment better in the future as this is a developing areas which I dont have a great deal of knowledge in at the moment

Page 9

Q36
Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

No further comments

Q37 **Respondent skipped this question**

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

#5

COMPLETE

Collector: Web Link 1 (Web Link)
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Page 1

Q1 Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Phillip Cook Cook

Q3

Email address

[REDACTED]

Q4

Local government

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

We undertake UAV Operations : Flood Protection, asset management / inspections, environmental & construction monitoring, Aerial Photography, Photogrammetry & Volumetric analysis

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

I agree, All drones should be registered with CAA & have transponders so manned & unmanned Aircraft have situational awareness of Aerial operations. This would also be a good feature to be able to identify who owns the drone. One step better, would be if ATC could deactivate a drone (if flown illegally in an airport for instance)

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

Yes, with changes ,

Please comment::

DJI drones already incorporate geozones. In controlled airspace, they are locked & require the pilot to obtain authorization to fly. This is a good safety feature. The missing link is Situational awareness. A transponder & drone registration is well overdue.

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

Yes, with changes ,

Please comment:

The hobbyist or nuisance drone age ? is it possible to enforce that ALL drones have transponders & registered especially those cheap warehouse /supercheap variety ?

Q10

Are there any other problems and opportunities you can think of?

Respondent skipped this question

Q11

Do you agree with the proposed order of implementation of the measures?

Yes

Page 4

Q12

Should drones have their own standalone Rule Part?

No ,

Please comment:

The Part 101 & 102 is sufficient, a quicker turnaround for UAOC applications (from CAA) would be appreciated

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

No ,

Please comment:

It is sufficient

Q14

Should we change the requirement to gain consent to fly above property?

No – keep the existing consent provision,

Please comment:

i do not agree with Flying drones over properties without prior permission

Q15 Yes – use ‘safe distances’ as an alternative

Should we change the requirement to gain consent to fly above people?

Q16 30 metres

If we use ‘safe distances’ as an alternative to the consent provision, what distance(s) would you consider appropriate?

Q17 Respondent skipped this question

Are there any other major Rules changes we should consider?

Q18 I don't know

Are there any minor changes to the Rules that would make them easier for you to understand?

Q19
What do you think of the proposed minor Rules changes?

Fine

Q20 Respondent skipped this question

Are there any other changes we should consider?

Page 5

Q21 Yes,
Please comment:
Basic theory test for understanding of CAR Part 101

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Q22
What impact would a basic pilot qualification likely have on you?

No impact. I have CAR Part 101 & 102 certificates

Q23 Electronic/online theory test

What format should this test take?

Q24 Yes, 16 years

Should there be a minimum age for basic pilot qualification?

Q25

Yes

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Is there any other special authorisations you would like to see?

no

Page 6

Q27

Yes

Should we introduce the proposed drone registration system?

Q28

What impact would drone registration likely have on you?

none..

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

fine

Q30

No

Should there be a minimum weight threshold for registering a drone?

Q31

No,

Should certain drones not need to be registered (select all that apply)

Please comment:
All drones should register

Page 7

Q32

Yes,

Should we introduce remote ID?

Please comment:
As long as it does not impact the operation

Q33

What impact would remote ID likely have on you?

None, if anything it would make the operation feel safer

Page 8

Q34

Should we consider introducing geo-awareness?

I don't know,

Please comment:

the DJI drone shave this built in - GEOZONES

Q35

What impact would geo-awareness likely have on you?

It could likely complicate our DJI operations within Geozones ?

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Respondent skipped this question

Q37

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

Respondent skipped this question

PROACTIVELY RELEASED BY
THE MINISTRY OF TRANSPORT

#6

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, May 17, 2021 9:02:56 PM
Last Modified: Monday, May 17, 2021 9:12:14 PM
Time Spent: 00:09:17
IP Address: [REDACTED]

Page 1

Q1 **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Beverley Prankerd

Q3

Email address

[REDACTED]

Q4

Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

Pilot

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

PROACTIVELY RELEASED BY THE MINISTRY OF TRANSPORT

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Think the proposed measures are a great start.

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

Yes,
Please comment::
Every size drone to be registered.

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

Yes

Q10

Are there any other problems and opportunities you can think of?

Respondent skipped this question

Q11

Do you agree with the proposed order of implementation of the measures?

Yes

Page 4

Q12

Should drones have their own standalone Rule Part?

Yes

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

Yes

Q14

Should we change the requirement to gain consent to fly above property?

No – keep the existing consent provision

Q15

Should we change the requirement to gain consent to fly above people?

No – keep the existing requirement

Q16

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

50 meters

Q17

Respondent skipped this question

Are there any other major Rules changes we should consider?

Q18

I don't know

Are there any minor changes to the Rules that would make them easier for you to understand?

Q19

What do you think of the proposed minor Rules changes?

Not worth the effort

Q20

Are there any other changes we should consider?

No

Page 5

Q21

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Yes, with changes ,

Please comment:

A minimum age is needed

Q22

What impact would a basic pilot qualification likely have on you?

None

Q23

What format should this test take?

A practical examination of skill and a paper based written theory test (at a provider)

Q24

Should there be a minimum age for basic pilot qualification?

Yes, 16 years

Q25

Yes

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Is there any other special authorisations you would like to see?

No

Page 6

Q27

Should we introduce the proposed drone registration system?

Yes, with changes,

Please comment:

All drones registered regardless of weight

Q28

What impact would drone registration likely have on you?

None

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Ok

Q30

Should there be a minimum weight threshold for registering a drone?

Yes, but with a different weight as the threshold ,

Please comment:

All weights

Q31

Should certain drones not need to be registered (select all that apply)

No

Page 7

Q32

Should we introduce remote ID?

Yes

Q33

What impact would remote ID likely have on you?

If it was like ADSB we maybe able to spot them on ADSB IN

Page 8



Q34

Yes

Should we consider introducing geo-awareness?

Q35

What impact would geo-awareness likely have on you?

None

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

I had a near miss with a drone on takeoff from an aerodrome. Never even knew it was close. Could have resulted in a downed plane.

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

PROACTIVELY RELEASED BY
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#7

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, May 18, 2021 7:02:01 AM
Last Modified: Tuesday, May 18, 2021 7:22:45 AM
Time Spent: 00:20:44
IP Address: [REDACTED]

Page 1

Q1 Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Dave pope

Q3

Email address

[REDACTED]

Q4 Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

Fishing. Work photos

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

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Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Min age for pilot

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

Yes, with changes ,

Please comment::

Training may not help, as flight problems seem to be gps and flight input won't help.

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

Yes, with changes ,

Please comment:

License for pilot to ensure min age, as not a toy and people need to understand the rules and risks. I have been an rc pilot for many years and it's hard to stamp out the idiots.

Q10

Are there any other problems and opportunities you can think of?

Respondent skipped this question

Q11

Do you agree with the proposed order of implementation of the measures?

Yes

Page 4

Q12

Should drones have their own standalone Rule Part?

Yes,

Please comment:

Max height ie 30m

Q13

Should we review the four kilometre minimum flight distance from aerodromes?

Yes,

Please comment:

Height ceiling less and no flying in flight path

Q14

Should we change the requirement to gain consent to fly above property?

Yes – relax the consent provision in another way,

Please comment:

No fly over personal property, but crown land allowed

Q15

Should we change the requirement to gain consent to fly above people?

Yes – use 'safe distances' as an alternative

Q16

30 metres

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Q17

Respondent skipped this question

Are there any other major Rules changes we should consider?

Q18

No

Are there any minor changes to the Rules that would make them easier for you to understand?

Q19

Respondent skipped this question

What do you think of the proposed minor Rules changes?

Q20

Respondent skipped this question

Are there any other changes we should consider?

Page 5

Q21

Yes, with changes ,

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Please comment:

Reduce the weight. 16years the are not responsible

Q22

What impact would a basic pilot qualification likely have on you?

I would take the test

Q23

A practical examination of skill and a paper based written theory test (at a provider)

What format should this test take?

Q24

Yes, other age (please specify):

Should there be a minimum age for basic pilot qualification?

18

Q25

Yes

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Is there any other special authorisations you would like to see?

Fishing only license, used for work only

Page 6

Q27

Yes

Should we introduce the proposed drone registration system?

Q28

What impact would drone registration likely have on you?

Would register

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Good

Q30

Should there be a minimum weight threshold for registering a drone?

Yes, but with a different weight as the threshold ,
Please comment:
Add 500g etc

Q31

Yes, drones flown solely indoors

Should certain drones not need to be registered (select all that apply)

Page 7

Q32

Yes

Should we introduce remote ID?

Q33

What impact would remote ID likely have on you?

Would comply

Page 8



Q34

Should we consider introducing geo-awareness?

Yes,

Please comment:

I do use current app to log flight

Q35

What impact would geo-awareness likely have on you?

Would use

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Respondent skipped this question

Q37

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

Respondent skipped this question

PROACTIVELY RELEASED BY
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#8

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, May 18, 2021 9:21:38 AM
Last Modified: Tuesday, May 18, 2021 9:36:29 AM
Time Spent: 00:14:50
IP Address: [REDACTED]

Page 1

Q1 **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

M D Boyle

Q3

Email address

[REDACTED]

Q4

Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones
maintaining aviation safety

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

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Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Measure look okay, but drone registration and identification needs to happen sooner rather than later.

Q8

Yes

Do you think the proposed series of measures would help achieve the desired objectives?

Q9

Yes

Do you think the proposed series of measures would address the problems and opportunities identified?

Q10

Are there any other problems and opportunities you can think of?

this is a fast moving industry and the law and regulations need to keep pace.

Q11

No,

Do you agree with the proposed order of implementation of the measures?

Please comment:
drone registration and identification needs to happen sooner rather than later.

Page 4

Q12

Yes

Should drones have their own standalone Rule Part?

Q13

Yes,

Should we review the four-kilometre minimum flight distance from aerodromes?

Please comment:
but drone identification is required

Q14

No – keep the existing consent provision,

Should we change the requirement to gain consent to fly above property?

Please comment:
privacy is paramount

Q15

Yes – relax the requirement in another way,

Should we change the requirement to gain consent to fly above people?

Please comment:
still need to think about drone reliability

Enabling Drone Integration

Q16	Other (please specify): 20 meters
If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?	
Q17	Respondent skipped this question
Are there any other major Rules changes we should consider?	
Q18	No
Are there any minor changes to the Rules that would make them easier for you to understand?	
Q19	
What do you think of the proposed minor Rules changes? definitely require drone pilot qualifications	
Q20	Respondent skipped this question
Are there any other changes we should consider?	
Page 5	
Q21	Yes
Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?	
Q22	Respondent skipped this question
What impact would a basic pilot qualification likely have on you?	
Q23	Other (please specify): electronic/online theory test (in a controlled/secure environment and a practical examination of skill)
What format should this test take?	
Q24	Yes, 16 years
Should there be a minimum age for basic pilot qualification?	
Q25	Yes
Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?	

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27

Yes

Should we introduce the proposed drone registration system?

Q28

Respondent skipped this question

What impact would drone registration likely have on you?

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

great idea - sooner rather than later

Q30

Yes, with 250 grams as the weight threshold

Should there be a minimum weight threshold for registering a drone?

Q31

Yes, drones flown solely indoors,

Should certain drones not need to be registered (select all that apply)

Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)

Page 7

Q32

Yes

Should we introduce remote ID?

Q33

Respondent skipped this question

What impact would remote ID likely have on you?

Page 8

Q34

Yes

Should we consider introducing geo-awareness?

Q35

Respondent skipped this question

What impact would geo-awareness likely have on you?

Page 9

Q36

Respondent skipped this question

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

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#9

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, May 18, 2021 9:26:43 AM
Last Modified: Tuesday, May 18, 2021 10:09:56 AM
Time Spent: 00:43:13
IP Address: [REDACTED]

Page 1

Q1 **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Scott

Q3

Email address

[REDACTED]

Q4

Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

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Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Design the drone system from the start with a view to be compatible with, or at the very least complimentary to, traditional ATM and aircraft systems.

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

Yes, with changes ,

Please comment:

I suggest the Basic Pilot Qualification is assessed and administered by the CAA's examination partner ASPEQ. In this way, drone pilot databases are in the same format as and can be easily cross-referenced with traditional pilot databases. In due course, additional qualifications will be needed that sit in the gap between Basic Drone Pilot and PPL/CPL/ATPL.

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

Yes, with changes ,

Please comment:

The greatest risk to NZ, both economically and reputationally from drone use is loss of life caused by drone v aircraft mid-air collision. Therefore drone electronic conspicuity (termed Remote ID in the discussion document) should have the reception and automatic avoidance of ADS-B IN 1090Mhz as its foundation. This will enable automatic actioning of Part 101.13 Right of Way. Larger drones should also transmit ADS-B OUT so that they can be visible to ATC and aircraft. In due course, lower range/other formats of electronic conspicuity can then be adopted to aid drone v drone deconfliction and aircraft awareness of smaller drones (although the fundamental of drones giving way to aircraft should remain extant).

Q10

Are there any other problems and opportunities you can think of?

Licensing requirements for drones that are effectively traditional aircraft but without a pilot on board. The flight dynamics and aerodynamic forces on a fixed wing RPAS that takes off and lands like a traditional aircraft are vastly different than those of a multi-rotor drone with auto stability (which are virtually impossible to fly without the aid of said auto stability). The Royal Air Force RPAS Branch (Reaper) training system, and British Army Watchkeeper training might be a good place to start in terms of a syllabus.

Q11

Do you agree with the proposed order of implementation of the measures?

No,

Please comment:

Geo-Awareness is integrally linked to electronic conspicuity (remote ID), so the two need to run in parallel.

Q12

Yes

Should drones have their own standalone Rule Part?

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

Yes,

Please comment:

Review, but not reduce. 4km distance from aerodrome should be considered an absolute minimum and not reduced. The exclusion zone needs to take into account both the size of the traditional aircraft circuit and the size of the aerodrome. In some instances, such as NZAA and NZCH the distance needs to be much greater. Approach to NZQN Rwy 05 is also a particular concern. Non aerodrome locations should also fall under this category such as certain glaciers, beaches, Ag Ops locations, river beds that are regularly used by traditional users. GeoFencing should be utilised extensively to ensure compliance.

Q14

Should we change the requirement to gain consent to fly above property?

I don't know,

Please comment:

I'm on the fence about this. I understand that enforcement is difficult, but I don't see that as a valid reason to remove a rule. It is difficult to police low flying, yet we still have rules for it. I think the UK drone code, which has been in operation in various forms since at least 2017 is a good place to start. <https://register-drones.caa.co.uk/drone-code/where-you-can-fly>.

Q15

Should we change the requirement to gain consent to fly above people?

No – keep the existing requirement,

Please comment:

See above.

Q16

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

50 meters

Q17

Are there any other major Rules changes we should consider?

Part 102. Obligation for operators to 'Notify' other users of activities. This effectively shuts out traditional users of high density areas in the Southern Alps. Wording should be changed to 'Engage' with a view to coming to an agreed set of activities for 102 drone operators and traditional users. A significant organisation that needs to be kept in the loop is the Southern Alps MBZ User Group. This also extends to other high density and high demand areas of NZ.

Q18

No

Are there any minor changes to the Rules that would make them easier for you to understand?

Q19

What do you think of the proposed minor Rules changes?

Fine

Q20

Are there any other changes we should consider?

No

Page 5

Q21

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Yes,

Please comment:

Qual should be assessed and administered by ASPEQ.

Q22

What impact would a basic pilot qualification likely have on you?

More confidence that drone pilots can operate safely.

Q23

Electronic/online theory test

What format should this test take?

Q24

No

Should there be a minimum age for basic pilot qualification?

Q25

Yes

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Is there any other special authorisations you would like to see?

Nil.

Page 6

Q27

Yes

Should we introduce the proposed drone registration system?

Q28

What impact would drone registration likely have on you?

Confident that drone operators will receive important rule/operating updates and that enforcement can take place if necessary.

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

While current drone applications do not warrant inclusion on the aircraft register, much like the gap in licensing, a time will come where certain drones will need to be registered by the CAA.

Q30

Yes, with 250 grams as the weight threshold

Should there be a minimum weight threshold for registering a drone?

Q31

Yes, drones flown solely indoors,

Should certain drones not need to be registered (select all that apply)

Please comment:

MFNZ should still require registration (in the interests of fairness)

Page 7

Q32

Should we introduce remote ID?

Yes,

Please comment:

See earlier comment. Should begin with ADS-B IN capability with a view to automatic avoidance of ADS-B OUT transmissions, i.e. automatic/AI application of CAA rule Part 101.213 Right of Way. Larger aircraft-sized drones should also transmit ADS-B OUT and be fully compliant with existing ATM.

Q33

What impact would remote ID likely have on you?

Confident that the likely hood of drone v aircraft mid-air collision is reduced.

Page 8

Q34

Should we consider introducing geo-awareness?

Yes,

Please comment:

Drone specific maps should simplify but not remove significant aeronautical information. i.e. the types of airspace don't matter, simply that all airspace that is prohibited is labelled as such (MOAs, Danger Areas, Restricted Areas etc). Geo Fencing should be extensively used to ensure compliance around aerodromes, hospitals, military, prisons, sensitive nature areas, certain public conservation land etc. See also previous comment about non-aerodrome landing sites for traditional aircraft.

Q35

What impact would geo-awareness likely have on you?

Confident that drones cannot go where they will constitute a hazard or cause nuisance.

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Please keep me in the loop with developments, particularly on the issue of pilot licensing in the gaps that I have identified.

Q37

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

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#10

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, May 14, 2021 10:07:16 PM
Last Modified: Tuesday, May 18, 2021 11:04:51 AM
Time Spent: Over a day
IP Address: [REDACTED]

Page 1

Q1 **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Matthew Dimock

Q3

Email address

[REDACTED]

Q4

Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

Recreational RC flying

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

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Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

1- Please register the pilot, rather than the aircraft.

2- Please consider that fixed wing aircraft models are different to multi rotors. They are not generally used for photography and hence are not often flown in restricted/built up areas. They could be made exempt or have different rules. Why are all "drones" being treated with the same rules? when they all have different flying characteristics.

3- Why when all the proposed rules are in place will manned aircraft have less restrictions than drones? This is a severe double standard. A para glider pilot will still be able to fly off a hill without any form of remote ID.

Q8

Yes, with changes

Do you think the proposed series of measures would help achieve the desired objectives?

Q9

Yes, with changes

Do you think the proposed series of measures would address the problems and opportunities identified?

Q10

Respondent skipped this question

Are there any other problems and opportunities you can think of?

Q11

Yes

Do you agree with the proposed order of implementation of the measures?

Page 4

Q12

Yes

Should drones have their own standalone Rule Part?

Q13

Yes

Should we review the four-kilometre minimum flight distance from aerodromes?

Q14

Yes – remove the consent provision completely

Should we change the requirement to gain consent to fly above property?

Q15

Yes – remove the requirement completely

Should we change the requirement to gain consent to fly above people?

Q16

30 metres

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Q17

Respondent skipped this question

Are there any other major Rules changes we should consider?

Q18

No

Are there any minor changes to the Rules that would make them easier for you to understand?

Q19

What do you think of the proposed minor Rules changes?

I agree with removing the spotter requirement for fpv flying. The job description of a spotter is vague, a spotter will not be able to prevent an incident from happening. Modern flight computers on fpv aircraft with the return to launch function are a much better option for regaining control when the video feed breaks down.

Q20

Respondent skipped this question

Are there any other changes we should consider?

Page 5

Q21

Yes

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Q22

What impact would a basic pilot qualification likely have on you?

As an experienced pilot it does not worry me.

Q23

Electronic/online theory test

What format should this test take?

Q24

No

Should there be a minimum age for basic pilot qualification?

Q25

Yes

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27

Yes, with changes

Should we introduce the proposed drone registration system?

Q28

Respondent skipped this question

What impact would drone registration likely have on you?

Q29

Respondent skipped this question

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Q30

Yes, but with a different weight as the threshold ,

Should there be a minimum weight threshold for registering a drone?

Please comment:

Its not the weight, but weight combined with velocity that effects collision energy. Unless the maximum velocity of the aircraft is in the equation why is this rule being considered? Also the materials the drones are made from has a huge effect on the collision damage.

Q31

Yes, others (please specify below),

Should certain drones not need to be registered (select all that apply)

Please comment:

Please register the pilots, not the drones. Its impossible to be able to fly more than one drone at a time.

Page 7

Q32

Should we introduce remote ID?

No,

Please comment:

It's better to prevent than cure, I believe the resources spent on remote ID would be better spent on educating drone operators with the rules. Remote ID will not stop people who want to break the rules. If you want better safety a self policing culture needs to be in place. This will not happen with big brother type policy's.

Q33

What impact would remote ID likely have on you?

Added expenses and complications to the enjoyment of my hobby.

Page 8

Q34

Should we consider introducing geo-awareness?

Yes,

Please comment:

I believe this is required ASAP, how can you blame operators from breaking the airspace rules when there is no public easy to find/defined map currently.

Q35

What impact would geo-awareness likely have on you?

I would always check it before flying in a new location.

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Respondent skipped this question

Q37

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

Respondent skipped this question

#11

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, May 18, 2021 10:57:57 AM
Last Modified: Tuesday, May 18, 2021 11:31:15 AM
Time Spent: 00:33:17
IP Address: [REDACTED]

Page 1

Q1 **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Russell Bell

Q3

Email address

[REDACTED]

Q4

Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

Collision risk. I am a private pilot

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

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THE MINISTRY OF TRANSPORT

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

A drone heavier than about 250g is heavy enough to damage or destroy a small aircraft. The pilot of such a drone must be either a legally-responsible adult, or a child under direct supervision of an adult. The pilot (or their supervisor) must take responsibility, they must be capable of being criminally liable in the event of an accident.

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

No,

Please comment:

As stated above, these measures relax restrictions on drone operators but do not ensure responsibility is taken for safe operations.

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

No,

Please comment:

Pilot qualification does not ensure responsibility. The drone pilot is not injured or killed if their drone collides with a manned aircraft. Only the pilot of the aircraft is at personal risk. To compensate for this imbalance the drone pilot must be criminally liable for their actions.

Q10

Are there any other problems and opportunities you can think of?

Respondent skipped this question

Q11

Do you agree with the proposed order of implementation of the measures?

No,

Please comment:

We should not allow children to fly heavy drones when those children cannot be held criminally liable for their actions. Qualifications are no solution.

Page 4

Q12

Should drones have their own standalone Rule Part?

I don't know

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

No

Q14

Should we change the requirement to gain consent to fly above property?

No – keep the existing consent provision,

Please comment:

Drones represent a risk both of invasion of privacy and of personal hazard

Q15

Should we change the requirement to gain consent to fly above people?

No – keep the existing requirement,

Please comment:

Flying a heavy drone overhead a person puts that person at risk of bodily harm, while the drone operator is not faced with the same personal risk. People do not take the same kind of care when their own person is not at risk. Qualification will not fix this.

Q16

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Other (please specify):

Consent is required

Q17

Are there any other major Rules changes we should consider?

Respondent skipped this question

Q18

Are there any minor changes to the Rules that would make them easier for you to understand?

No

Q19

What do you think of the proposed minor Rules changes?

Respondent skipped this question

Q20

Are there any other changes we should consider?

Respondent skipped this question

Page 5

Q21

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

No,

Please comment:

A minimum age is necessary

Q22

What impact would a basic pilot qualification likely have on you?

I fly a small aeroplane, allowing children to fly heavy drones puts me at direct personal risk

Q23

What format should this test take?

Other (please specify):

The nature of the test does not address the problem

Enabling Drone Integration

Q24 Should there be a minimum age for basic pilot qualification?

Yes, other age (please specify):
The age when someone is regarded by the law as an adult, fully responsible for their actions

Q25 Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

No

Q26 Is there any other special authorisations you would like to see?

Respondent skipped this question

Page 6

Q27 Should we introduce the proposed drone registration system?

No,
Please comment:
Pointless

Q28 What impact would drone registration likely have on you?

None

Q29 What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Likely to raise costs for drone operators without affecting effective responsibility

Q30 Should there be a minimum weight threshold for registering a drone?

Yes, with 250 grams as the weight threshold

Q31 Should certain drones not need to be registered (select all that apply)

Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)

Page 7

Q32 Should we introduce remote ID?

No,
Please comment:
Only if the identification was via standard ADS-B

Q33

What impact would remote ID likely have on you?

If identification was via ADS-B (e.g. for large drones) it would provide a safety benefit to aircraft operators

Page 8

Q34

Should we consider introducing geo-awareness?

No,

Please comment:

Drone operators must themselves identify safe areas to operate their drones. A digital map would diminish responsibility. Inevitably the digital map would contain mistakes, or would be off-line when the drone operator needed it; the drone operator must themselves be responsible for identifying where and when they can operate, they must not be able to blame some other party for a failure to identify (for example) an airfield.

Q35

What impact would geo-awareness likely have on you?

Diminish safety

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Respondent skipped this question

Q37

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

Respondent skipped this question

PROACTIVELY RELEASED BY THE MINISTRY OF TRANSPORT

#12

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, May 18, 2021 12:31:56 PM
Last Modified: Tuesday, May 18, 2021 12:49:07 PM
Time Spent: 00:17:10
IP Address: [REDACTED]

Page 1

Q1 Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

P Sheehan

Q3

Email address

[REDACTED]

Q4

Who are you submitting on behalf of?

Other,

If you are not submitting as an individual, please specify who you represent.:

My Company

Q5

Briefly tell us your interest in drones

Business activity

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

PROACTIVELY RELEASED BY THE MINISTRY OF TRANSPORT

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Heading in the right direction

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

Yes, with changes ,

Please comment::
remain flexible

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

I don't know,

Please comment:
trial and error - retain ability to change track

Q10

Are there any other problems and opportunities you can think of?

Full ADSB - support ground station funding and implimentation

Q11

Do you agree with the proposed order of implementation of the measures?

Yes

Page 4

Q12

Should drones have their own standalone Rule Part?

No ,

Please comment:
airspace management

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

Yes,

Please comment:
1 KM with full ADSB

Q14

Should we change the requirement to gain consent to fly above property?

Yes – use 'safe distances' as an alternative

Q15

Should we change the requirement to gain consent to fly above people?

Yes – use 'safe distances' as an alternative

Q16

30 metres

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Q17

Are there any other major Rules changes we should consider?

Try these first

Q18

No

Are there any minor changes to the Rules that would make them easier for you to understand?

Q19

What do you think of the proposed minor Rules changes?

positive

Q20

Are there any other changes we should consider?

not now

Page 5

Q21

Yes

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Q22

What impact would a basic pilot qualification likely have on you?

Law / Navigation / Airspace

Q23

Electronic/online theory test

What format should this test take?

Q24

Yes, 16 years

Should there be a minimum age for basic pilot qualification?

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Q25

Yes

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27

Yes,

Should we introduce the proposed drone registration system?

Please comment:
don't inflate the cost!!

Q28

What impact would drone registration likely have on you?

provide freedom to fly without filing flight Plans

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

obvious method

Q30

Should there be a minimum weight threshold for registering a drone?

Yes, but with a different weight as the threshold ,

Please comment:
include available flight time say 5 min

Q31

Should certain drones not need to be registered (select all that apply)

Yes, drones flown solely indoors,

Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)

Page 7

Q32

Yes

Should we introduce remote ID?

Q33

What impact would remote ID likely have on you?

Public acceptance

Page 8

Q34

Should we consider introducing geo-awareness?

Yes,

Please comment:
mandatory

Q35

What impact would geo-awareness likely have on you?

risk management

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Respondent skipped this question

Q37

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

Respondent skipped this question

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#13

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, May 18, 2021 1:55:24 PM
Last Modified: Tuesday, May 18, 2021 2:18:17 PM
Time Spent: 00:22:52
IP Address: [REDACTED]

Page 1

Q1 Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Russell Thorne

Q3

Email address

[REDACTED]

Q4

Who are you submitting on behalf of?

Non-government organisation/advocacy group,
If you are not submitting as an individual, please specify who you represent.:
Auckland Gliding Club

Q5

Briefly tell us your interest in drones

Nearby subdivision activity has many drones operating

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

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Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Do not allow drone operations near airports without notification.

Make drones identifiable by distinctive colour

Most drone applications I get are commercial, none from recreational operators.

Minimum training and licensing is justified

Not outside visual range

Q8

I don't know

Do you think the proposed series of measures would help achieve the desired objectives?

Q9

I don't know

Do you think the proposed series of measures would address the problems and opportunities identified?

Q10

Respondent skipped this question

Are there any other problems and opportunities you can think of?

Q11

Yes

Do you agree with the proposed order of implementation of the measures?

Page 4

Q12

Yes

Should drones have their own standalone Rule Part?

Q13

No

Should we review the four kilometre minimum flight distance from aerodromes?

Q14

No – keep the existing consent provision

Should we change the requirement to gain consent to fly above property?

Q15

No – keep the existing requirement

Should we change the requirement to gain consent to fly above people?

Q16

50 meters

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Q17

Respondent skipped this question

Are there any other major Rules changes we should consider?

Q18

I don't know

Are there any minor changes to the Rules that would make them easier for you to understand?

Q19

Respondent skipped this question

What do you think of the proposed minor Rules changes?

Q20

Respondent skipped this question

Are there any other changes we should consider?

Page 5

Q21

Yes

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Q22

What impact would a basic pilot qualification likely have on you?

Confidence about standards

Q23

Electronic/online theory test

What format should this test take?

Q24

Yes, 16 years

Should there be a minimum age for basic pilot qualification?

Q25

Yes

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27

Yes

Should we introduce the proposed drone registration system?

Q28

What impact would drone registration likely have on you?

Tracing and tracking

Q29

Respondent skipped this question

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Q30

Yes, with 250 grams as the weight threshold

Should there be a minimum weight threshold for registering a drone?

Q31

Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)

Should certain drones not need to be registered (select all that apply)

Page 7

Q32

Yes

Should we introduce remote ID?

Q33

Respondent skipped this question

What impact would remote ID likely have on you?

Page 8

Q34

Yes

Should we consider introducing geo-awareness?

Q35

Respondent skipped this question

What impact would geo-awareness likely have on you?

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

No

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

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#14

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, May 18, 2021 3:00:08 PM
Last Modified: Tuesday, May 18, 2021 3:25:04 PM
Time Spent: 00:24:56
IP Address: [REDACTED]

Page 1

Q1 Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Ernie

Q3

Email address

[REDACTED]

Q4

Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

I currently have a drone

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

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Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

The way the measures are going, you'll only be able to fly within your own property. What's going to happen when you want to photograph/video a sporting event or us for a training purposes(sports, IE= Open water swimming running cycling)

Q8

No

Do you think the proposed series of measures would help achieve the desired objectives?

Q9

Yes, with changes

Do you think the proposed series of measures would address the problems and opportunities identified?

Q10

Are there any other problems and opportunities you can think of?

A newer drone has a camera and you can see where you're going, as a older/cheaper drone doesn't. It's the older/cheaper drones that need looking into.

Q11

Yes

Do you agree with the proposed order of implementation of the measures?

Page 4

Q12

Yes

Should drones have their own standalone Rule Part?

Q13

Yes,

Please comment:

Should we review the four-kilometre minimum flight distance from aerodromes?

Some drones will not take off within the 4km, unless you unlock them.

Q14

Yes – relax the consent provision in another way

Should we change the requirement to gain consent to fly above property?

Q15

Yes – relax the requirement in another way

Should we change the requirement to gain consent to fly above people?

Q16

30 metres

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Q17

Respondent skipped this question

Are there any other major Rules changes we should consider?

Q18

No

Are there any minor changes to the Rules that would make them easier for you to understand?

Q19

Respondent skipped this question

What do you think of the proposed minor Rules changes?

Q20

Respondent skipped this question

Are there any other changes we should consider?

Page 5

Q21

Yes, with changes

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Q22

What impact would a basic pilot qualification likely have on you?

Time to do the qualifying requirements

Q23

Electronic/online theory test

What format should this test take?

Q24

Yes, 16 years

Should there be a minimum age for basic pilot qualification?

Q25

No

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27

Yes, with changes

Should we introduce the proposed drone registration system?

Q28

What impact would drone registration likely have on you?

Very little

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

N/a

Q30

Should there be a minimum weight threshold for registering a drone?

Yes, but with a different weight as the threshold ,
Please comment:
Some drones are heavier

Q31

Should certain drones not need to be registered (select all that apply)

Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)
,
Yes, others (please specify below),
Please comment:
When used for spotting events

Page 7

Q32

Yes

Should we introduce remote ID?

Q33

What impact would remote ID likely have on you?

None

Page 8

Q34

Yes

Should we consider introducing geo-awareness?

Q35

What impact would geo-awareness likely have on you?

None

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Nope

Q37

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

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#15

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, May 18, 2021 3:15:33 PM
Last Modified: Tuesday, May 18, 2021 3:26:15 PM
Time Spent: 00:10:42
IP Address: [REDACTED]

Page 1

Q1 **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

wayne carkeek

Q3

Email address

[REDACTED]

Q4

Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

just a hobby, non commercial , we used to call them unpowered gliders in my day

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

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Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

private planes have a worse safety record , the current rules have pretty much killed the hobby already, more rules on top will be the end

Q8

No

Do you think the proposed series of measures would help achieve the desired objectives?

Q9

No

Do you think the proposed series of measures would address the problems and opportunities identified?

Q10

Are there any other problems and opportunities you can think of?

flying a quad copter in your yard or at a park a suitable distance from others shouldnt be so hard , and Heli ports should not have 4km around them exsp when the heli pad is on top of a high building

Q11

No

Do you agree with the proposed order of implementation of the measures?

Page 4

Q12

I don't know

Should drones have their own standalone Rule Part?

Q13

Yes

Should we review the four-kilometre minimum flight distance from aerodromes?

Q14

Yes – use 'safe distances' as an alternative

Should we change the requirement to gain consent to fly above property?

Q15

No – keep the existing requirement

Should we change the requirement to gain consent to fly above people?

Q16

10 metres

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Q17

Respondent skipped this question

Are there any other major Rules changes we should consider?

Q18

I don't know

Are there any minor changes to the Rules that would make them easier for you to understand?

Q19

Respondent skipped this question

What do you think of the proposed minor Rules changes?

Q20

Respondent skipped this question

Are there any other changes we should consider?

Page 5

Q21

Yes,

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Please comment:

the licence should not incur an ongoing charge or have a requirement to join a club

Q22

What impact would a basic pilot qualification likely have on you?

i have flown for 30 years with no badge but in the presence of others with one or at home , the qual could have me flying again , i just gave up due to the liability and risk and gave away most of my gliders, it sucked the fun of a peaceful flight right out of my life.

Q23

Electronic/online theory test

What format should this test take?

Q24

No

Should there be a minimum age for basic pilot qualification?

Q25

I don't know

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27

I don't know

Should we introduce the proposed drone registration system?

Q28

Respondent skipped this question

What impact would drone registration likely have on you?

Q29

Respondent skipped this question

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Q30

Yes, but with a different weight as the threshold

Should there be a minimum weight threshold for registering a drone?

Q31

Yes, others (please specify below),

Should certain drones not need to be registered (select all that apply)

Please comment:
no registration

Page 7

Q32

No,
Please comment:
too expensive

Should we introduce remote ID?

Q33

What impact would remote ID likely have on you?

id likely stop flying completely , making a glider and flying off the side of a cliff top with the gulls would just get too hard and no longer be fun

Page 8

Q34

I don't know

Should we consider introducing geo-awareness?

Q35

Respondent skipped this question

What impact would geo-awareness likely have on you?

Page 9

Q36

Respondent skipped this question

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

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THE MINISTRY OF TRANSPORT

#16

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, May 18, 2021 3:28:28 PM
Last Modified: Tuesday, May 18, 2021 3:35:38 PM
Time Spent: 00:07:09
IP Address: [REDACTED]

Page 1

Q1 **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Daniel

Q3

Email address

[REDACTED]

Q4 **Myself**

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

I fly the for recreational purposes

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

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Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

No

Q8

Yes

Do you think the proposed series of measures would help achieve the desired objectives?

Q9

Yes

Do you think the proposed series of measures would address the problems and opportunities identified?

Q10

Respondent skipped this question

Are there any other problems and opportunities you can think of?

Q11

Yes

Do you agree with the proposed order of implementation of the measures?

Page 4

Q12

Yes

Should drones have their own standalone Rule Part?

Q13

Yes

Should we review the four-kilometre minimum flight distance from aerodromes?

Q14

Yes – relax the consent provision in another way,

Should we change the requirement to gain consent to fly above property?

Please comment:

I think consent required for flying over dense residential properties but not more rural or public land

Q15

Yes – relax the requirement in another way,

Should we change the requirement to gain consent to fly above people?

Please comment:

I think consent required for flying over dense residential properties but not more rural or public land

Q16

10 metres

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Q17

Are there any other major Rules changes we should consider?

I think consent required for flying over dense residential properties but not more rural or public land

Q18

Yes

Are there any minor changes to the Rules that would make them easier for you to understand?

Q19

Respondent skipped this question

What do you think of the proposed minor Rules changes?

Q20

Are there any other changes we should consider?

I think consent required for flying over dense residential properties but not more rural or public land

Page 5

Q21

Yes

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Q22

Respondent skipped this question

What impact would a basic pilot qualification likely have on you?

Q23

Electronic/online theory test

What format should this test take?

Q24

Yes, other age (please specify):
18

Should there be a minimum age for basic pilot qualification?

Q25

Yes

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27 Yes

Should we introduce the proposed drone registration system?

Q28 Respondent skipped this question

What impact would drone registration likely have on you?

Q29 Respondent skipped this question

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Q30 Yes, with 250 grams as the weight threshold

Should there be a minimum weight threshold for registering a drone?

Q31 Yes, drones flown solely indoors

Should certain drones not need to be registered (select all that apply)

Page 7

Q32 Yes

Should we introduce remote ID?

Q33 Respondent skipped this question

What impact would remote ID likely have on you?

Page 8

Q34 Yes

Should we consider introducing geo-awareness?

Q35 Respondent skipped this question

What impact would geo-awareness likely have on you?

Page 9

Q36

Respondent skipped this question

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

PROACTIVELY RELEASED BY
THE MINISTRY OF TRANSPORT

#17

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, May 18, 2021 3:31:36 PM
Last Modified: Tuesday, May 18, 2021 3:53:09 PM
Time Spent: 00:21:32
IP Address: [REDACTED]

Page 1

Q1 Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Alan Duff

Q3

Email address

[REDACTED]

Q4 Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

As part of my job photographing real estate in the Coromandel I also use drones to photograph properties

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

It should be mandatory to use a receiver to listen in to the intent of aircraft in the area, they are inexpensive to buy & being a receiver no license is required to use them, and provide an invaluable overall picture of what that passing plane is doing or intends to do.

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

Yes,

Please comment::

Hopefully, misinformation by the general public is commonplace, I have learnt not to argue with them when they are wrong, hang your head, say your sorry & walk off even & avoid conflict, you cant argue with a sick mind.

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

Yes

Q10

Are there any other problems and opportunities you can think of?

As I mentioned above - receivers need to be mandatory, such a simple measure to do and pilots need to sharpen up & make the required radio calls at the appropriate times, unfortunately a common problem in the Coromandel...

Q11

Do you agree with the proposed order of implementation of the measures?

Yes,

Please comment:

Good luck

Page 4

Q12

Should drones have their own standalone Rule Part?

I don't know

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

No ,

Please comment:

That is more than adequate

Q14

Should we change the requirement to gain consent to fly above property?

No – keep the existing consent provision,

Please comment:

its a tricky one as I have explained to property owners I can fly right up to their boundary without their permission while photographing their neighbours but if my drone is 200' above its very hard to tell if it is or not from the neighbours point of view, so maybe more public notices need to be out there to educate them

Q15 Yes – use 'safe distances' as an alternative

Should we change the requirement to gain consent to fly above people?

Q16 50 meters

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Q17 Respondent skipped this question

Are there any other major Rules changes we should consider?

Q18 No

Are there any minor changes to the Rules that would make them easier for you to understand?

Q19 Respondent skipped this question

What do you think of the proposed minor Rules changes?

Q20 Respondent skipped this question

Are there any other changes we should consider?

Page 5

Q21 Yes

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Q22 What impact would a basic pilot qualification likely have on you?

none as I sat my 102 (bit expensive @ \$2600)

Q23 Electronic/online theory test

What format should this test take?

Q24 Respondent skipped this question

Should there be a minimum age for basic pilot qualification?

Q25

Yes

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27

Yes

Should we introduce the proposed drone registration system?

Q28

Respondent skipped this question

What impact would drone registration likely have on you?

Q29

Respondent skipped this question

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Q30

Yes, with 250 grams as the weight threshold

Should there be a minimum weight threshold for registering a drone?

Q31

Yes, drones flown solely indoors

Should certain drones not need to be registered (select all that apply)

Page 7

Q32

I don't know

Should we introduce remote ID?

Q33

What impact would remote ID likely have on you?

If I lost it I could find it easier

Page 8

Q34

Yes

Should we consider introducing geo-awareness?

Q35

Respondent skipped this question

What impact would geo-awareness likely have on you?

Page 9

Q36

Respondent skipped this question

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

PROACTIVELY RELEASED BY
THE MINISTRY OF TRANSPORT

#18

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, May 18, 2021 4:30:26 PM
Last Modified: Tuesday, May 18, 2021 4:55:30 PM
Time Spent: 00:25:03
IP Address: [REDACTED]

Page 1

Q1 Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Carol

Q3

Email address

Q4

Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

I fly drones

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

Page 3

PROACTIVELY RELEASED BY
THE MINISTRY OF TRANSPORT

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

They are good and take the industry in the direction wanted, however, the remote ID and geo-awareness take away from overall flight time. They will add weight and take on board power.

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

Yes, with changes ,

Please comment::

Most recreational drone pilots just want to enjoy flying the drone. Most professionals need air time. Remote-ID's and Geo-awareness devices will add weight and consume onboard power resulting in shorter flight times. If it becomes too much, the drones will become unfit for purpose.

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

Yes, with changes ,

Please comment:

See above.

Q10

Are there any other problems and opportunities you can think of?

Respondent skipped this question

Q11

Do you agree with the proposed order of implementation of the measures?

Yes,

Please comment:

With the caveat that you will also have to include the persons/businesses who sale drones.

Page 4

Q12

Should drones have their own standalone Rule Part?

Yes,

Please comment:

There are huge differences between a model aeroplane or model and a drone. One is just for recreation while the other is also a scientific and technical tool.

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

No ,

Please comment:

In some cases it is extreme, especially around the seldom used though still controlled aerodromes.

Q14

Should we change the requirement to gain consent to fly above property?

Yes – relax the consent provision in another way,

Please comment:

It will be difficult to comply with a consent distance.

Q15

Should we change the requirement to gain consent to fly above people?

Yes – relax the requirement in another way,

Please comment:

See above comment, although I have used a sign that states: 'drone with camera operating in area, going beyond this point will be assumed to confer consent to be incidentally filmed.'

Q16

30 metres

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Q17

Are there any other major Rules changes we should consider?

Drones should be registered and have a registration number displayed on them.

Q18

No

Are there any minor changes to the Rules that would make them easier for you to understand?

Q19

Respondent skipped this question

What do you think of the proposed minor Rules changes?

Q20

Respondent skipped this question

Are there any other changes we should consider?

Page 5

Q21

Yes

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Q22

What impact would a basic pilot qualification likely have on you?

Little

Q23

Electronic/online theory test

What format should this test take?

Q24

Yes, 14 years

Should there be a minimum age for basic pilot qualification?

Q25

Yes

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27

Yes

Should we introduce the proposed drone registration system?

Q28

What impact would drone registration likely have on you?

None.

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

No issues

Q30

Yes, with 250 grams as the weight threshold

Should there be a minimum weight threshold for registering a drone?

Q31

No,

Should certain drones not need to be registered (select all that apply)

Please comment:

Register them all. What would stop that 'solely indoors' drone from being taken outside. Why should Model Flying NZ be special?

Page 7

Q32

Should we introduce remote ID?

Yes,

Please comment:

It will require on-board systems that will require power usage. It will also add weight and reduce overall flight time.

Q33

What impact would remote ID likely have on you?

Shorter flights, more use of my extra batteries.

Page 8

Q34

Should we consider introducing geo-awareness?

Yes,

Please comment:

It will make the location of drones easier however, again will add weight and power usage thus reducing flight times.

Q35

What impact would geo-awareness likely have on you?

Reduced flight times.

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

It is a move in the right direction.

Q37

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

PROACTIVELY RELEASED BY
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#19

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, May 18, 2021 2:41:02 PM
Last Modified: Tuesday, May 18, 2021 5:49:46 PM
Time Spent: 03:08:43
IP Address: [REDACTED]

Page 1

Q1 Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Bob Girvan

Q3

Email address

[REDACTED]

Q4

Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

Aerial photography and film making

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

PROACTIVELY RELEASED BY
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Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Over kill. It's a similar situation to gun laws. It's not the law abiding gun/drone owner that is the problem. It is the ones who do not follow the rules, regardless of what the rules are there will be the rouge operator who will not be interested in any rules let alone comply with them.

The majority of drone operators follow the rules and we do need another level of bureaucratic to solve a problem that can be achieved through simple education.

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

No,

Please comment::

I am all for education but the cost of "Basic qualification" must be at a lower enough rate that drone operators will readily participate. Drone Registration is not the answer. All of the identified benefits of registration will be achieved by Basic Qualification. All a registration scheme would do is provide more constraints on those who already comply with the rules. New Zealand does not need an ineffective bureaucratic solution to the drone problem. Registration would probably also provide a revenue stream for whoever administers the scheme. It is no secret Airways NZ would like to provide a mandatory drone flight authorisation service—for a fee. Drone identification has not worked overseas and will not work here. Waste of time until all drone manufacturers agree on a standard technology and even then home built drones will bypass identification.

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

No,

Please comment:

for the reasons given above.

Q10

Are there any other problems and opportunities you can think of?

Respondent skipped this question

Q11

Do you agree with the proposed order of implementation of the measures?

Please comment:

Page 4

Q12

Should drones have their own standalone Rule Part?

Yes

Q13 **Yes,**
Should we review the four-kilometre minimum flight distance from aerodromes?
Please comment:
Review yes, but change if there is a real problem (as aposed to preceived problem) to be solved.

Q14 **No – keep the existing consent provision**
Should we change the requirement to gain consent to fly above property?

Q15 **Yes – use 'safe distances' as an alternative**
Should we change the requirement to gain consent to fly above people?

Q16 **30 metres**
If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Q17 **Respondent skipped this question**
Are there any other major Rules changes we should consider?

Q18 **No**
Are there any minor changes to the Rules that would make them easier for you to understand?

Q19 **Respondent skipped this question**
What do you think of the proposed minor Rules changes?

Q20 **Respondent skipped this question**
Are there any other changes we should consider?

Page 5

Q21 **Yes, with changes ,**
Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?
Please comment:
Yes, provided that the test can be completed at no or very little cost. The purpose of the qualification like all qualifications is education. Education should be the primary goal. It should NOT be a revenue generating exercise.

Q22

What impact would a basic pilot qualification likely have on you?

None, I have already learnt the rules and abide by them.

Q23

Electronic/online theory test

What format should this test take?

Q24

No

Should there be a minimum age for basic pilot qualification?

Q25

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

No,

Please comment:

Not for part 101, as stated above education should be the primary goal. It should NOT be a revenue generating exercise.

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27

Should we introduce the proposed drone registration system?

No,

Please comment:

Waste of time. Would only be seen up close in which case you would probably be able to see the operator. The other situation where the registration could and would need to be read would be if the drone crashed while flying illegally and was not destroyed. In which case registration would not have prevented the illegal flight

Q28

What impact would drone registration likely have on you?

Potential cost

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Not needed. Huge potential cost of implementation with little gains. Basic qualification will achieve the same result.

Q30

Respondent skipped this question

Should there be a minimum weight threshold for registering a drone?

Q31

Respondent skipped this question

Should certain drones not need to be registered (select all that apply)

Page 7

Q32

Should we introduce remote ID?

No,

Please comment:

Cost of implementation and compliance would be very large and the benefits would be achieved with basic qualification. The F3411 Standard Specification is very restrictive and in some cases require internet coverage. There are vast areas of NZ where there is no such coverage.

Q33

What impact would remote ID likely have on you?

Cost, restrictive with no benefits

Page 8

Q34

Should we consider introducing geo-awareness?

Yes,

Please comment:

Awareness yes. Fencing only for safety sake. If an area is fenced and an operator seeks permission to fly in that area it may mean a major effect is required to enable the drone to fly. Education is key here. Provide maps in easy to use formats.

Q35

What impact would geo-awareness likely have on you?

Potentially helpful. Potentially restrictive.

Page 9

Q36

Respondent skipped this question

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

PROACTIVELY RELEASED BY
THE MINISTRY OF TRANSPORT

#20

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, May 18, 2021 8:24:05 PM
Last Modified: Tuesday, May 18, 2021 8:41:50 PM
Time Spent: 00:17:45
IP Address: [REDACTED]

Page 1

Q1 **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Carl Morgan

Q3

Email address

[REDACTED]

Q4

Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

Private Pilot PPL / Aircraft owner operator

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Remote identification publishing to the ADSB system for > 500' drones / within 5nm of airfields for aviation integration would be sensible / good. Could be done by base stations.

Q8

Yes

Do you think the proposed series of measures would help achieve the desired objectives?

Q9

Yes

Do you think the proposed series of measures would address the problems and opportunities identified?

Q10

Are there any other problems and opportunities you can think of?

Information of location / drones to in the air aviation users - eg ADSB

Q11

Yes

Do you agree with the proposed order of implementation of the measures?

Page 4

Q12

Yes

Should drones have their own standalone Rule Part?

Q13

Should we review the four kilometre minimum flight distance from aerodromes?

No ,

Please comment:

4km is a minimum - flying circuits whilst worrying about identify / avoiding drones should not be the airborne parties focus. Primary safety matter.

Q14

Yes – use 'safe distances' as an alternative

Should we change the requirement to gain consent to fly above property?

Q15

Yes – use 'safe distances' as an alternative

Should we change the requirement to gain consent to fly above people?

Q16

30 metres

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Q17

Respondent skipped this question

Are there any other major Rules changes we should consider?

Q18

No

Are there any minor changes to the Rules that would make them easier for you to understand?

Q19

Respondent skipped this question

What do you think of the proposed minor Rules changes?

Q20

Respondent skipped this question

Are there any other changes we should consider?

Page 5

Q21

Yes

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Q22

What impact would a basic pilot qualification likely have on you?

None

Q23

Electronic/online theory test

What format should this test take?

Q24

Yes, 14 years

Should there be a minimum age for basic pilot qualification?

Q25

Yes

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?



Q26

Is there any other special authorisations you would like to see?

Consideration for exisiting private owners and/or other CAA Aviation document holders. Eg flying near airfields with a radio license / comms.

Page 6

Q27

Yes

Should we introduce the proposed drone registration system?

Q28

What impact would drone registration likely have on you?

Require registration

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

RealMe or CAA client id, digital platform, one time simple registration.

How do you deal with onsold / second hand drones? Multiple pilots / users?

Q30

Yes, with 250 grams as the weight threshold

Should there be a minimum weight threshold for registering a drone?

Q31

Yes, drones flown solely indoors,

Should certain drones not need to be registered (select all that apply)

Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)

Page 7

Q32

Yes

Should we introduce remote ID?

Q33

What impact would remote ID likely have on you?

Increased safety as an aviation user

Page 8

Q34

Yes

Should we consider introducing geo-awareness?

Q35

What impact would geo-awareness likely have on you?

GEO awareness with other non-drone systems (eg airport, aircraft etc)

Page 9

Q36

Respondent skipped this question

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

PROACTIVELY RELEASED BY
THE MINISTRY OF TRANSPORT

#21

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, May 18, 2021 11:15:38 PM
Last Modified: Wednesday, May 19, 2021 12:27:54 AM
Time Spent: 01:12:15
IP Address: [REDACTED]

Page 1

Q1 Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Richard Kern

Q3

Email address

[REDACTED]

Q4 Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

Recreational user

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

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THE MINISTRY OF TRANSPORT

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

As a diy recreational park flyer the 2015 rule changes had a very chilling effect on my enjoyment of a hobby I loved. I am glad to see consideration given to clarifying some of the ambiguity, the lifting of the consent requirements, and the recognition that FPV and BVLOS flight is and will continue to be a big part of the industry moving forward.

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

Yes, with changes ,

Please comment::

Compliance will continue to be a challenge if unreasonable barriers are put up. High compliance costs would be one such barrier. Another barrier would be remote ID transmitters if they were either expensive or added much weight, especially for lighter models.

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

I don't know,

Please comment:

While the core frameworks need to be made fit for purpose and that will take time, you will find that those who are aware and want to do the right thing will try do the right thing anyway, unless the rules are seen as unworkable and too ambiguous to be of any use. You are going to have trouble getting to the oblivious, and willfully ignorant, users who currently don't know any better.

Q10

Are there any other problems and opportunities you can think of?

Keep costs to a minimum, make allowances for recreational model flyers who aren't flying the likes of DJI drones etc, but equally do not fit into the confines of MFNZ. Don't make the registration and marking of models etc too prescriptive or onerous.

Q11

Do you agree with the proposed order of implementation of the measures?

Yes

Page 4

Q12

Should drones have their own standalone Rule Part?

Yes,

Please comment:

But only if it means that for example hobby model aircraft flying outside the confines of MFNZ is freed up a bit. Also if the Drone part allowed better for flight monitored through live video feed or FPV

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

Yes

Q14

Should we change the requirement to gain consent to fly above property?

Yes – remove the consent provision completely,

Please comment:

As mentioned, other legislation accounts for the privacy concerns of using drones to spy or other nefarious purposes. The consent provisions of the 2015 rules change had a very chilling effect on legitimate recreational hobby use and caused a lot of confusion, especially when it came to public land.

Q15

Should we change the requirement to gain consent to fly above people?

Yes – use 'safe distances' as an alternative,

Please comment:

Same as above, but keeping a safe distance from strangers as a courtesy is probably a good compromise. This should not be too prescriptive though as the ability of the public to judge distance is not always the greatest

Q16

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

10 metres

Q17

Are there any other major Rules changes we should consider?

Better allowing for FPV and use of video monitoring for the likes of DJI type drones etc in Part 101.

Q18

Are there any minor changes to the Rules that would make them easier for you to understand?

I don't know

Q19

What do you think of the proposed minor Rules changes?

Respondent skipped this question

Q20

Are there any other changes we should consider?

Respondent skipped this question

Page 5

Q21

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

I don't know,

Please comment:

If we do it should be set up in such a way that it is not a significant barrier in either cost, convenience of obtaining, or maintaining

Q22

What impact would a basic pilot qualification likely have on you?

None really, as long as it is not cost prohibitive I would get it. As an airshare app user I find those sorts of things convenient.

Q23

Electronic/online theory test

What format should this test take?

Q24

Yes, 14 years

Should there be a minimum age for basic pilot qualification?

Q25

Yes

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27

I don't know,

Should we introduce the proposed drone registration system?

Please comment:

I'm not sure how effective it would be, particularly at such a light base weight.

Q28

What impact would drone registration likely have on you?

Depends how onerous and expensive it is

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Any system would have to be both digital, and secure, with positive identification of users.

Q30

Yes, but with a different weight as the threshold ,

Should there be a minimum weight threshold for registering a drone?

Please comment:

250g seems too light,

Q31

Should certain drones not need to be registered (select all that apply)

Yes, drones flown solely indoors,

Yes, others (please specify below),

Please comment:

Park flyer class foam and balsa model aircraft should be exempt

Page 7

Q32

Should we introduce remote ID?

No,

Please comment:

Its use case for implementation would need to be pretty specific and I would think would be more relevant in Part 102 flight. Relying on cellular, WiFi, or Bluetooth transmission is also highly impractical as it would rely on the drone to be tethered to a mobile phone that is within sufficient cellular coverage with available data. Equally, an ADS-B transponder type system would be quite cost prohibitive, and heavy to use on many recreational type drones. I do note that DJI have the ability to receive ADS-B signals in their newer >250g models, they do not however transmit.

Q33

What impact would remote ID likely have on you?

Unclear at this stage as I'm not sure what aircraft would need it, I only have a DJI Mavic Air at the moment from a drone perspective. I also have various foam aircraft that have not been used in a while.

Page 8

Q34

Should we consider introducing geo-awareness?

I don't know,

Please comment:

The airshare app is a good start, particularly for pre-flight planning. Integrating the spacial data into, for instance, the DJI mapping data could be a good thing. But, not all drones or model aircraft would have even the base capability to make use of this in flight.

Q35

What impact would geo-awareness likely have on you?

On my DJI not alot as it already has some geo aware boundaries. I already use airshare, so if that was improved it might be good.

Page 9

Q36

Respondent skipped this question

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

PROACTIVELY RELEASED BY
THE MINISTRY OF TRANSPORT

#22

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, May 19, 2021 9:13:25 AM
Last Modified: Wednesday, May 19, 2021 9:43:39 AM
Time Spent: 00:30:14
IP Address: [REDACTED]

Page 1

Q1 **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Peter Jackson

Q3

Email address

[REDACTED]

Q4

Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

Lifetime of photography. 20 years in RNZAF. Caught the Aerial view of photography

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

PROACTIVELY RELEASED BY THE MINISTRY OF TRANSPORT

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Totally sensible.

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

Yes,

Please comment::

This is the only way to go to maintain safety yet let the drone operator achieve.

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

Yes

Q10

Are there any other problems and opportunities you can think of?

No ... so long as there is a sense of personal responsibility

Q11

Do you agree with the proposed order of implementation of the measures?

Yes

Page 4

Q12

Should drones have their own standalone Rule Part?

No

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

Yes,

Please comment:

As long as the drone operator is qualified.

Q14

Should we change the requirement to gain consent to fly above property?

Yes – remove the consent provision completely,

Please comment:

Aircraft do it all the time ... ???

Q15

Should we change the requirement to gain consent to fly above people?

Yes – use 'safe distances' as an alternative,

Please comment:

Must fly outside of personal recognition and safety and must have a genuine purpose for being there.

Q16

50 meters

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Q17

Are there any other major Rules changes we should consider?

License the operator of a drone (with a camera) that can exceed 100m from operator.

Q18

Are there any minor changes to the Rules that would make them easier for you to understand?

I don't know,

Please comment:

Need more time to think about this

Q19

What do you think of the proposed minor Rules changes?

Respondent skipped this question

Q20

Are there any other changes we should consider?

Need more time to consider

Page 5

Q21

Yes

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Q22

What impact would a basic pilot qualification likely have on you?

nil

Q23

What format should this test take?

A practical examination of skill and a paper based written theory test (at a provider)

Q24

Yes, 16 years

Should there be a minimum age for basic pilot qualification?

Enabling Drone Integration

Q25

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Yes,

Please comment:

Needs to be sufficient access to appropriate courses where a 102 qualification can be given at the end of it provided the individual passes. I have had difficulty finding one of these .

Q26

Is there any other special authorisations you would like to see?

Respondent skipped this question

Page 6

Q27

Should we introduce the proposed drone registration system?

Yes,

Please comment:

Without question. And register the aircraft against the operator.

Q28

What impact would drone registration likely have on you?

Nil

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

perfect

Q30

Should there be a minimum weight threshold for registering a drone?

No,

Please comment:

once qualified (102 or equivalent) an operator should be able to fly and drone up to 20kg

Q31

Should certain drones not need to be registered (select all that apply)

Yes, drones flown solely indoors,

Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)

Page 7

Q32

Should we introduce remote ID?

Yes,

Please comment:

If all is legitimate ... where is the problem

Q33

Respondent skipped this question

What impact would remote ID likely have on you?

Page 8

Q34

Should we consider introducing geo-awareness?

Yes,
Please comment:
Logical

Q35

What impact would geo-awareness likely have on you?

Nil

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Thankyou for reassessing this important area as it needs to be. I have been flying drone for 8 years and really appreciated being able to put a camera where I need on. The general public need reassurance that drone are being operated by qualified people for appropriate reason. Drones are going to be use more and more due to their cost effectiveness , immediate response(for Police, Fire , search and rescue etc) They now can carry some great equipment to help all those services Yet there needs to be proper training around this. Getting a system in place to achieve this is perfect. Well done.

Q37

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

I am happy to be public as you like ... in fact here is my cell number 021779719

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#23

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, May 19, 2021 10:12:56 AM
Last Modified: Wednesday, May 19, 2021 10:43:14 AM
Time Spent: 00:30:17
IP Address: [REDACTED]

Page 1

Q1 Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Linda Bulk

Q3

Email address

[REDACTED]

Q4 Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

As the director and GM of Aeronavics, I have been active in the drone industry for a long time (since 2008) - I felt compelled to also respond as a person whilst the director of flight ops represents the company's point of view.

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

In my opinion the proposed series of measures address the main issues required to ensure safe drone operation by both commercial and recreational operators and present a good foundation to progress towards full drone integration into NZ airspace.

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

Yes, with changes ,

Please comment::

Generally Yes. Some changes proposed further in this survey.

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

Yes, with changes ,

Please comment:

Generally Yes. Some changes proposed further in this survey.

Q10

Are there any other problems and opportunities you can think of?

BVLOS and automated installations present an expansive range of potentials in NZ and should be included in new regulations soon in our opinion - however, not in this round of proposed regulatory changes as significant development work is still required to establish and prove suitable safe operational frameworks for BVLOS.

Q11

Do you agree with the proposed order of implementation of the measures?

Yes

Page 4

Q12

Should drones have their own standalone Rule Part?

Yes,

Please comment:

Yes. There is a considerable difference between operating conventional aircraft and drones.

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

No ,

Please comment:

Not yet - maybe after some of these rules are implemented. For now it's safe - those who need to operate within the 4km can with the appropriate certification.

Q14

Should we change the requirement to gain consent to fly above property?

No – keep the existing consent provision,

Please comment:

Personally, I think people's privacy should be secured - again those who need to operate over other people's property have a way (Part 102) to get around this.

Q15

Should we change the requirement to gain consent to fly above people?

Yes – use 'safe distances' as an alternative,

Please comment:

Assuming this is in public places and not in their backyard, I believe 'safe distance should suffice - the heavier the aircraft the further this distance should be.

Q16

30 metres

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Q17

Are there any other major Rules changes we should consider?

The Rule changes are generally focused on drones operated by a pilot within LOS control or First Person View (FPV). With advances in technology, automated drone operations are expected to become a major factor in the growth of the industry. This raises the issue of what an "automated" drone is? How much automation compared to pilot interaction also becomes a factor. The Rules should consider a definition of "automation" and ideally identify various levels. One such matrix has been developed by Exyn Technologies, a USA based drone manufacturer.

Q18

Are there any minor changes to the Rules that would make them easier for you to understand?

No,

Please comment:

If a drone pilot cannot understand the rules as they are being presented here then they probably should not be piloting a drone at all.

Q19

What do you think of the proposed minor Rules changes?

They are well thought through and present a sound and safe progression of drone rules in NZ.

Q20

Are there any other changes we should consider?

This is something Aeronavics will engage with MBIE for in the AITP.

Page 5

Q21

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Yes,

Please comment:

Totally!

Q22

What impact would a basic pilot qualification likely have on you?

Safer skies?

Q23

Electronic/online theory test

What format should this test take?

Q24

Yes, 16 years

Should there be a minimum age for basic pilot qualification?

Q25

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Yes,

Please comment:

Provided the content in the Basic Qualification training is all covered within Part 141 and Part 101.202 training, holders of such qualifications should not be required to hold the Basic Qualification. However, a licensing system should be integrated to ensure a consistent approach to record keeping of qualifications and issue of ID style licenses.

Q26

Is there any other special authorisations you would like to see?

As the drone industry evolves, particularly for commercial applications, simultaneous monitoring of multiple drones on a "fleet management" basis will become a reality. This will require more comprehensive training and licensing arrangements.

Page 6

Q27

Yes

Should we introduce the proposed drone registration system?

Q28

What impact would drone registration likely have on you?

Only positive even though we will also have to register our aircraft - ultimately this will be the only way to establish a unified platform.

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Looks good.

Q30

Yes, with 250 grams as the weight threshold

Should there be a minimum weight threshold for registering a drone?

Q31

Should certain drones not need to be registered (select all that apply)

No,

Please comment:

It would probably make sense to exempt only indoors drones and MFNZ drones, but wouldn't it be grand to have a full inventory. Purely from a safety perspective those though could be exempted.

Page 7

Q32

Should we introduce remote ID?

Yes,

Please comment:

Totally

Q33

What impact would remote ID likely have on you?

Simple to include.

Page 8

Q34

Should we consider introducing geo-awareness?

Yes,

Please comment:

es - it will help form the basis of a smarter drone industry in the future and provide more safety in the skies over time. It is important to consider this now and move toward a framework that enables devices to respond to their environment, especially when it comes to restricted airspace and no fly zones such as CTA.

Q35

What impact would geo-awareness likely have on you?

It will further support our company's objectives for further automation and increased adoption of drones.

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Appreciate the work that has gone into this document and the consultation process.

Q37

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

All good...

#24

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, May 19, 2021 11:57:15 AM
Last Modified: Wednesday, May 19, 2021 12:04:49 PM
Time Spent: 00:07:33
IP Address: [REDACTED]

Page 1

Q1 Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Brad Maclachlan

Q3

Email address

[REDACTED]

Q4

Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

Safety Hazard to all aircraft

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

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Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Do not change any restrictions for drones.

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

No,
Please comment::
Why risk human lives so a drone can be flown?

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

No,
Please comment:
as above

Q10

Are there any other problems and opportunities you can think of?

No

Q11

Do you agree with the proposed order of implementation of the measures?

No

Page 4

Q12

Should drones have their own standalone Rule Part?

No

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

No

Q14

Should we change the requirement to gain consent to fly above property?

No – keep the existing consent provision

Q15

Should we change the requirement to gain consent to fly above people?

No – keep the existing requirement

Q16

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Other (please specify):
No distance is appropriate without consent

Q17

Are there any other major Rules changes we should consider?

No

Q18

No

Are there any minor changes to the Rules that would make them easier for you to understand?

Q19

Respondent skipped this question

What do you think of the proposed minor Rules changes?

Q20

Respondent skipped this question

Are there any other changes we should consider?

Page 5

Q21

No

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Q22

What impact would a basic pilot qualification likely have on you?

Drone pilots thinking that they know how proper aircraft operate and making their own decisions is not a good idea

Q23

What format should this test take?

Other (please specify):

Drone pilots already act like they know everything this will make it worse

Q24

Should there be a minimum age for basic pilot qualification?

Yes, other age (please specify):

Shouldnt br a basic pilot qual for drone

Q25

No

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27 **Yes**
Should we introduce the proposed drone registration system?

Q28
What impact would drone registration likely have on you?
Knowing which muppet causes problems when they do something wrong

Q29 Respondent skipped this question
What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Q30 **No**
Should there be a minimum weight threshold for registering a drone?

Q31 **No**
Should certain drones not need to be registered (select all that apply)

Page 7

Q32 **Yes**
Should we introduce remote ID?

Q33 Respondent skipped this question
What impact would remote ID likely have on you?

Page 8

Q34 **No**
Should we consider introducing geo-awareness?

Q35 Respondent skipped this question
What impact would geo-awareness likely have on you?

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Reducing items in place so that more drones can fly especially without consent is a direct safety issue and also a privacy issue. Lives will be lost if this goes through and for what?

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

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#25

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, May 19, 2021 12:21:39 PM
Last Modified: Wednesday, May 19, 2021 12:37:00 PM
Time Spent: 00:15:20
IP Address: [REDACTED]

Page 1

Q1 Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Jamie Henery

Q3

Email address

[REDACTED]

Q4 Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

As a commercial helicopter pilot, I encounter drones. They can be a danger to part 135 operation and I have had incidents with drones.

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Working in the Westland national park and as a part of the local user group and DOC we require drone operators to be part 102 certified to operate in the area due to the high traffic area. We have found this to be very good and safe.

Q8

Yes

Do you think the proposed series of measures would help achieve the desired objectives?

Q9

Yes

Do you think the proposed series of measures would address the problems and opportunities identified?

Q10

Respondent skipped this question

Are there any other problems and opportunities you can think of?

Q11

Yes

Do you agree with the proposed order of implementation of the measures?

Page 4

Q12

Yes

Should drones have their own standalone Rule Part?

Q13

No

Should we review the four-kilometre minimum flight distance from aerodromes?

Q14

No – keep the existing consent provision

Should we change the requirement to gain consent to fly above property?

Q15

No – keep the existing requirement

Should we change the requirement to gain consent to fly above people?

Q16

50 meters

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Q17

Respondent skipped this question

Are there any other major Rules changes we should consider?

Q18

No

Are there any minor changes to the Rules that would make them easier for you to understand?

Q19

Respondent skipped this question

What do you think of the proposed minor Rules changes?

Q20

Respondent skipped this question

Are there any other changes we should consider?

Page 5

Q21

Yes

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Q22

What impact would a basic pilot qualification likely have on you?

Make me fell safer will operating as a 135 pilot

Q23

A practical examination of skill and a paper based written theory test (at a provider)

What format should this test take?

Q24

Yes, 16 years

Should there be a minimum age for basic pilot qualification?

Q25

Yes

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27

Yes

Should we introduce the proposed drone registration system?

Q28

What impact would drone registration likely have on you?

Nothing

Q29

Respondent skipped this question

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Q30

Yes, with 250 grams as the weight threshold

Should there be a minimum weight threshold for registering a drone?

Q31

Yes, drones flown solely indoors

Should certain drones not need to be registered (select all that apply)

Page 7

Q32

Yes

Should we introduce remote ID?

Q33

Respondent skipped this question

What impact would remote ID likely have on you?

Page 8

Q34

Yes

Should we consider introducing geo-awareness?

Q35

Respondent skipped this question

What impact would geo-awareness likely have on you?

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Drone operators knowing who t

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

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#26

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, May 19, 2021 1:10:45 PM
Last Modified: Wednesday, May 19, 2021 1:21:01 PM
Time Spent: 00:10:16
IP Address: [REDACTED]

Page 1

Q1 **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Lee Paterson

Q3

Email address

[REDACTED]

Q4

Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

I am a drone surveyor and land modeller

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

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Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

more red tape for those already inclined to follow rules

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

No,

Please comment::

Enforcement is not consistent... for example the recent occurrence in Dunedin with the youngster flying the drone near the hospital... with no apparent publicity on what penalties were put in place... i.e. removal of the drone?

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

No

Q10

Are there any other problems and opportunities you can think of?

the public need to be educated on the actual risks, and drones need to be removed from people breaking existing rules

Q11

Do you agree with the proposed order of implementation of the measures?

No

Page 4

Q12

Should drones have their own standalone Rule Part?

Yes

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

No ,

Please comment:

this is effective, and DJI already uses "no fly" override requirements in these areas

Q14

Should we change the requirement to gain consent to fly above property?

Yes – use 'safe distances' as an alternative,

Please comment:

ownership of the column of airspace over a property needs to be more clearly understood by all

Q15

Should we change the requirement to gain consent to fly above people?

Yes – use 'safe distances' as an alternative

Q16

50 meters

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Q17

Respondent skipped this question

Are there any other major Rules changes we should consider?

Q18

Respondent skipped this question

Are there any minor changes to the Rules that would make them easier for you to understand?

Q19

Respondent skipped this question

What do you think of the proposed minor Rules changes?

Q20

Respondent skipped this question

Are there any other changes we should consider?

Page 5

Q21

Yes,

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Please comment:
provided it is online only - similar to the USA process

Q22

What impact would a basic pilot qualification likely have on you?

none at all

Q23

Electronic/online theory test

What format should this test take?

Q24

Yes, 14 years

Should there be a minimum age for basic pilot qualification?

Q25

Yes

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27

Yes

Should we introduce the proposed drone registration system?

Q28

What impact would drone registration likely have on you?

none

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

all based upon already compliant operators... not the bad actors that the system needs to catch

Q30

Yes, with 250 grams as the weight threshold

Should there be a minimum weight threshold for registering a drone?

Q31

Yes, drones flown solely indoors,

Should certain drones not need to be registered (select all that apply)

Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)

Page 7

Q32

No,

Should we introduce remote ID?

Please comment:

costly, and targets already compliant operators

Q33

What impact would remote ID likely have on you?

cost / compliance

Page 8

Q34

Should we consider introducing geo-awareness?

Yes,

Please comment:

as long as it is integrated into airshare

Q35

What impact would geo-awareness likely have on you?

none

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Respondent skipped this question

Q37

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

Respondent skipped this question

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#27

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, May 19, 2021 1:17:28 PM
Last Modified: Wednesday, May 19, 2021 1:27:52 PM
Time Spent: 00:10:23
IP Address: [REDACTED]

Page 1

Q1 **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Ben Ruffell

Q3

Email address

[REDACTED]

Q4

Who are you submitting on behalf of?

Other,

If you are not submitting as an individual, please specify who you represent.:

Overview 2015 Ltd

Q5

Briefly tell us your interest in drones

We are a CAA102 Drone Company based in Queenstown

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

We support these proposed measures.

Q8

Yes

Do you think the proposed series of measures would help achieve the desired objectives?

Q9

Yes

Do you think the proposed series of measures would address the problems and opportunities identified?

Q10

Are there any other problems and opportunities you can think of?

Our primary concern would be how are the rules to be enforced with tourists?

Our secondary concern would be regarding the remote identification technology roll out, and ensuring that it is not disruptive to our business.

Q11

Yes

Do you agree with the proposed order of implementation of the measures?

Page 4

Q12

Yes

Should drones have their own standalone Rule Part?

Q13

No

Should we review the four-kilometre minimum flight distance from aerodromes?

Q14

Yes – use 'safe distances' as an alternative

Should we change the requirement to gain consent to fly above property?

Q15

No – keep the existing requirement

Should we change the requirement to gain consent to fly above people?

Q16

Respondent skipped this question

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Q17

Respondent skipped this question

Are there any other major Rules changes we should consider?

Q18

No

Are there any minor changes to the Rules that would make them easier for you to understand?

Q19

Respondent skipped this question

What do you think of the proposed minor Rules changes?

Q20

Respondent skipped this question

Are there any other changes we should consider?

Page 5

Q21

Yes

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Q22

What impact would a basic pilot qualification likely have on you?

None, we are a 102 organisation.

Q23

Electronic/online theory test

What format should this test take?

Q24

Yes, 16 years

Should there be a minimum age for basic pilot qualification?

Q25

I don't know

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

PROACTIVELY RELEASED BY THE MINISTRY OF TRANSPORT

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27

Yes

Should we introduce the proposed drone registration system?

Q28

Respondent skipped this question

What impact would drone registration likely have on you?

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

I believe that it will take several generations of drones for this to achieved.

Q30

No

Should there be a minimum weight threshold for registering a drone?

Q31

No

Should certain drones not need to be registered (select all that apply)

Page 7

Q32

I don't know,

Should we introduce remote ID?

Please comment:

We would want to see more evidence of how this will operate in real world usage.

Q33

Respondent skipped this question

What impact would remote ID likely have on you?

Page 8

Q34

I don't know

Should we consider introducing geo-awareness?

Q35

Respondent skipped this question

What impact would geo-awareness likely have on you?

Page 9

Q36

Respondent skipped this question

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

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#28

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, May 19, 2021 1:25:47 PM
Last Modified: Wednesday, May 19, 2021 1:35:06 PM
Time Spent: 00:09:18
IP Address: [REDACTED]

Page 1

Q1 **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Neil Jones

Q3

Email address

[REDACTED]

Q4

Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

I fly as business to shoot low altitude 360 panoramics in virtual tours and low altitude video for real estate etc.

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

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Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Registration and possible licensing is a great move forward. penalties for flight non compliance and dangerous flight is a definite requirement

Q8

Yes

Do you think the proposed series of measures would help achieve the desired objectives?

Q9

Yes

Do you think the proposed series of measures would address the problems and opportunities identified?

Q10

Respondent skipped this question

Are there any other problems and opportunities you can think of?

Q11

Yes

Do you agree with the proposed order of implementation of the measures?

Page 4

Q12

Yes

Should drones have their own standalone Rule Part?

Q13

I don't know

Should we review the four-kilometre minimum flight distance from aerodromes?

Q14

No – keep the existing consent provision

Should we change the requirement to gain consent to fly above property?

Q15

Yes – use 'safe distances' as an alternative

Should we change the requirement to gain consent to fly above people?

Q16

30 metres

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Q17

Respondent skipped this question

Are there any other major Rules changes we should consider?

Q18

I don't know

Are there any minor changes to the Rules that would make them easier for you to understand?

Q19

Respondent skipped this question

What do you think of the proposed minor Rules changes?

Q20

Respondent skipped this question

Are there any other changes we should consider?

Page 5

Q21

Yes

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Q22

Respondent skipped this question

What impact would a basic pilot qualification likely have on you?

Q23

Other (please specify):
practical plus electronic test (like driving test??)

What format should this test take?

Q24

Yes, other age (please specify):
18

Should there be a minimum age for basic pilot qualification?

Q25

I don't know

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Is there any other special authorisations you would like to see?

Registration and possible licensing is a great move forward. penalties for flight non compliance and dangerous flight is a definite requirement

Page 6

Q27

Should we introduce the proposed drone registration system?

Yes, with changes,

Please comment:

lower the weight registration requirement

Q28

What impact would drone registration likely have on you?

non - do it

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

good

Q30

Should there be a minimum weight threshold for registering a drone?

Yes, but with a different weight as the threshold ,

Please comment:

lower threshold

Q31

Should certain drones not need to be registered (select all that apply)

Yes, drones flown solely indoors

Page 7

Q32

Should we introduce remote ID?

I don't know

Q33

What impact would remote ID likely have on you?

Respondent skipped this question

Page 8

Q34

Should we consider introducing geo-awareness?

I don't know

Q35

What impact would geo-awareness likely have on you?

Respondent skipped this question

Page 9

Q36

Respondent skipped this question

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

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THE MINISTRY OF TRANSPORT

#29

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, May 19, 2021 1:30:46 PM
Last Modified: Wednesday, May 19, 2021 1:38:16 PM
Time Spent: 00:07:30
IP Address: [REDACTED]

Page 1

Q1 Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Dan Franks

Q3

Email address

[REDACTED]

Q4

Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

Professional Videographer - fly drones daily

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

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Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

No, I think all the above would be great!

Q8

Yes

Do you think the proposed series of measures would help achieve the desired objectives?

Q9

Yes

Do you think the proposed series of measures would address the problems and opportunities identified?

Q10

Are there any other problems and opportunities you can think of?

I think having more accessible access to DOC land, and public spaces would be great.

Q11

Yes

Do you agree with the proposed order of implementation of the measures?

Page 4

Q12

Yes

Should drones have their own standalone Rule Part?

Q13

Yes

Should we review the four-kilometre minimum flight distance from aerodromes?

Q14

Yes – use 'safe distances' as an alternative

Should we change the requirement to gain consent to fly above property?

Q15

Yes – remove the requirement completely

Should we change the requirement to gain consent to fly above people?

Q16

10 metres

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Q17

Respondent skipped this question

Are there any other major Rules changes we should consider?

Q18

No

Are there any minor changes to the Rules that would make them easier for you to understand?

Q19

Respondent skipped this question

What do you think of the proposed minor Rules changes?

Q20

Respondent skipped this question

Are there any other changes we should consider?

Page 5

Q21

Yes

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Q22

What impact would a basic pilot qualification likely have on you?

Beneficial in that it proves I am a capable pilot

Q23

A practical examination of skill and a paper based written theory test (at a provider)

What format should this test take?

Q24

Yes, 16 years

Should there be a minimum age for basic pilot qualification?

Q25

Yes

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27

Yes

Should we introduce the proposed drone registration system?

Q28

What impact would drone registration likely have on you?

Good, more accountable for actions

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Good to both

Q30

No

Should there be a minimum weight threshold for registering a drone?

Q31

Yes, drones flown solely indoors

Should certain drones not need to be registered (select all that apply)

Page 7

Q32

Yes

Should we introduce remote ID?

Q33

Respondent skipped this question

What impact would remote ID likely have on you?

Page 8

Q34

Yes

Should we consider introducing geo-awareness?

Q35

Respondent skipped this question

What impact would geo-awareness likely have on you?

Page 9

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Q36

Respondent skipped this question

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

PROACTIVELY RELEASED BY
THE MINISTRY OF TRANSPORT

#30

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, May 19, 2021 8:38:12 AM
Last Modified: Wednesday, May 19, 2021 1:39:20 PM
Time Spent: 05:01:08
IP Address: [REDACTED]

Page 1

Q1 Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Geraint Bermingham

Q3

Email address

Q4

Who are you submitting on behalf of?

Other,

If you are not submitting as an individual, please specify who you represent.:

Navigatus Consulting Ltd / Navigatus.aero

Q5

Briefly tell us your interest in drones

As an aviation risk consultancy company that lead the development of the NZ aviation safety criteria for the NSS project and, developed an UAV collision model and BVLOS Safety Case model for the CAA, we have built up specialist insights into the key risk factors and risk mitigation strategies for UAV operations. We consider that given an evidence based approach and use of best practice structured safety case methodologies, New Zealand has the opportunity to lead the safe introduction and integration of UAV technologies and, by being leaders, so reap significant economic benefits.

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

PROACTIVELY RELEASED BY THE MINISTRY OF TRANSPORT

Page 3

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

The proposal appears to be founded on a poorly defined and therefore non-optimal basis. At its core the issue is that the term "Drone" is not tightly or suitably defined. The consultation documents defines a drone as "Drones are aircraft that can be remotely piloted or flown autonomously" and with reference to the Rules as " an aircraft 'designed to operate with no pilot onboard'. The point that a drone can vary widely is made. Indeed as described in the document, it is clear a drone can be taken to be any type of aircraft (fixed wing, rotary, lighter than air etc), of any size, weight and capability (including model aircraft) as well as passenger capable or not and able to carry hazardous goods or otherwise. This exceptionally wide definition appears to have led to a situation where the existing rules and proposal cannot realistically be effective. The problem of the all encompassing definition is usefully illustrated with phrases like "are finding interesting and innovative ways of using this technology" and yet repeated reference to " safe transport system". This range of objectives managed under one regulatory framework will be challenging. The figure at Appendix 1 usefully illustrates the range (although using differing terms to that used elsewhere in the document).

Solution Part 1:

Start with a properly structured assessment of the risk factors and profiles of the full range of types of UAV to first enable classes to be defined by the features that drive the risk and hence need to regulate.

Solution Part 2:

Based upon 1 above, develop a regulatory / rules framework that is based first on feature and risk derived 'classes' or UAV would enable properly structured rules that best mitigate and control the risks associated with each 'class'.

Example 1:

Given the current non-UAV rules have developed over an extended time to mitigate the risk of aircraft, it makes sense to use these as the basis of rules for large aircraft sized UAV, but with risks created by the 'unmanned' feature being managed under a risk-based rule set (at least risk based until technologies and solutions become mature).

Example 2: Small toy micro-drones - maybe defined by power, mass and battery capacity (dependent on the findings of the baseline risk assessment) - would be, if regulated at all, be covered by say existing consumer protection laws and local By Laws.

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

No,

Please comment::

As the proposed measures start with such a wide definition of a 'drone' the proposed regime cannot be a best-match to the actual risk profiles of all the different types of UAV. While the 5 proposed series of regulatory measures may appear to be a solution to some 'problem' or range of 'problems' (not fully stated in the document) and will clearly have some impact on overall risk, there is no evidence presented that suggest that these have been derived from a properly structured and complete risk assessment that considered the risk profile of the full range of possible UAV, as there are now or maybe in the future. There is no indication what other proposed solutions/mitigations were considered or why these were selected. For example why 250g? Why not 'exposed rotors', or 'maximum energy' (mass and speed) as a criteria? It is also noted that the 4 later steps seem to preempt the outcome of the work to be done in step 1. Further, as noted before, for large aircraft sized UAV - if treated as aircraft - some of what is proposed would duplicate what is already required (such as registration, use of a standardised map (existing aviation charts) etc.

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

No,

Please comment:

Given the proposal is based upon: An overly wide scope Does not appear to be properly based on the risk profile that maps the many differing features/types of UAV Does not appear to recognise the value of the rules applicable to 'manned' aircraft. it is unlikely that the proposal will be as effective or efficient as a regime based on a complete and properly structured understanding the the drivers of risk and hence the optimum mitigations thereof. Despite reference to integration of drones into the CA system, the proposal does not mention ICAO in the body of the proposal. ICAO is the foundation on which any 'integration' has to be founded.

Q10

Are there any other problems and opportunities you can think of?

Clause 35 discusses consistency with overseas approaches and in particular UAS-AG and JARUS. Maintaining consistency in effect means at best, 'not leading' and almost certainly 'following others'. Given the small regulatory community and ease of doing business here, NZ could be the leaders in UAV developments and implementation of technologies. Waiting of ICAO or JARUS condemns NZ to be 'followers'.

Q11

Do you agree with the proposed order of implementation of the measures?

No,

Please comment:

Given a properly undertaken and structure risk profiling step, the outcome of Step 1 is unlikely to be optimal. Until the optimum practical mitigations are identified (again dependent on a full understanding of risk across the UAV sector (current and future), the order of implementation (and what to implement) can not be planned with confidence that the outcome will be as intended.

Page 4

Q12

Should drones have their own standalone Rule Part?

Yes,

Please comment:

Yes - but only for a sub-set of UAV (type / features) based upon a proper understanding of the 'safety risk' . No - for a sub-set of UAV that by there features/capability/type represent 'low risk' Existing rules plus - for UAV that are essentially normal aircraft but without onboard pilots.

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

Yes,

Please comment:

The principle is absolutely sound. Risk assessment and review to confirm refine the distance. Seek ATC and aerodrome managers views as key stakeholders. Safety of aerodromes must not be compromised.

Q14

Should we change the requirement to gain consent to fly above property?

Yes – relax the consent provision in another way,

Please comment:

Use other means (eg not CARs) unless where safety risk is the driver. In short, similar to normal aircraft constraints.

Q15

Should we change the requirement to gain consent to fly above people?

Yes – use 'safe distances' as an alternative,

Please comment:

Similar to existing rules for aircraft

Q16

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Other (please specify):

The answer to this should be risk based. Carry out a proper risk assessment. Height means more energy on loss of lift - so maybe counter intuitive if seen from a safety perspective.

Q17

Are there any other major Rules changes we should consider?

UAV developments are tied closely with the development of electric propulsion. Rule developments for large UAV and that for electric flight should be carried out with full consideration of the interplay between these technologies.

Q18

Are there any minor changes to the Rules that would make them easier for you to understand?

Respondent skipped this question

Q19

What do you think of the proposed minor Rules changes?

Respondent skipped this question

Q20

Are there any other changes we should consider?

Respondent skipped this question

Page 5

Q21

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Yes, with changes ,

Please comment:

Size classes (eg as per CASA).

Q22

What impact would a basic pilot qualification likely have on you?

Respondent skipped this question

Q23

Respondent skipped this question

What format should this test take?

Q24

Respondent skipped this question

Should there be a minimum age for basic pilot qualification?

Q25

I don't know

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27

Yes, with changes.

Should we introduce the proposed drone registration system?

Please comment:

Risk based criteria (criteria not just based on mass but on risk profile)

Q28

Respondent skipped this question

What impact would drone registration likely have on you?

Q29

Respondent skipped this question

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Q30

Yes, but with a different weight as the threshold ,

Should there be a minimum weight threshold for registering a drone?

Please comment:

Instead use a 'risk class'. Weight is not the only factor. Also consider more refined mass classes anyhow (eg CASA)

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Q31

Should certain drones not need to be registered (select all that apply)

Yes, drones flown solely indoors,

Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)

Yes, others (please specify below),

Please comment:

Low safety risk areas (remote / at sea etc)

Page 7

Q32

Should we introduce remote ID?

Yes,

Please comment:

But based upon risk class and not duplicating existing aircraft requirements (so only one system for a given aircraft)

Q33

What impact would remote ID likely have on you?

Respondent skipped this question

Page 8

Q34

Should we consider introducing geo-awareness?

Yes,

Please comment:

Consider it - but start by undertaking a full structured and ISO compliant risk profiling assessment. Then consider where geo-awareness would be a useful and practical mitigation (eg is it needed for small UAV in VLOS ops) . Separately large aircraft sized UAV and BVLOS ops will have to be geo-aware anyhow - illustrates that this question can only be answered if couched in terms of risk.

Q35

What impact would geo-awareness likely have on you?

Respondent skipped this question

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Respondent skipped this question

Q37

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

Respondent skipped this question

#31

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, May 19, 2021 12:15:54 PM
Last Modified: Wednesday, May 19, 2021 1:43:44 PM
Time Spent: 01:27:49
IP Address: [REDACTED]

Page 1

Q1 **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Chris Knapp

Q3

Email address

[REDACTED]

Q4

Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

I've flown model aircraft and have been a member of MFNZ for numerous years

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

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Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

I believe the measures are not going to achieve what is wanted as the drones are already out there and the same as cars guns or any other invention those that are going to do the illegal activities will do no matter what laws are in place.

With these proposals you are just adding undue expense and complication on those that will and are following the regulations as they stand.

I think the biggest issue here is the misreporting of drone sightings - the document references The Gatwick airport closure as reasoning for the measures but lets be clear that was a very bad and public incident with great financial costs but it has never actually been proven that there was a drone at all and in fact most respected authorities in the field are certain there was never a drone involved (<https://drdavidclarke.co.uk/2021/05/15/attack-of-the-drones/>)

there have also been studies and experiments involving drones and full sized aviation with the drone operator informing the pilot of exactly where the drone is to avoid a collision as both the drone and aircraft having GPS and the pilot knowing exactly where to look and getting within 200m still not being able to spot the drone highlighting the difficulty in drones ability to be seen and alluding further to their danger but more importantly spelling out that all of the sightings being received are very closely related to UFO sightings and are no indication that there is a drone in the area.

I believe there are suitable and sufficient rules currently in place and they just need to be followed! - the rules are simple and if followed safe for everybody.

The thing that needs to happen is policing - more rules isn't going to stop anything without the policing of the rules what we have currently provides a suitable easy to understand framework - we just need those that are flouting the rules to be brought in to line and more rules or requirements is not going to do that as they are already showing they do not follow the rules.

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

No,

Please comment:

As stated above the current rules provide a simple clear procedure that will keep everything and everybody safe if they are followed - the allowance for 102 registration is a good framework for mitigating risk outside of the safe basics. What we need and are missing is the policing of the rules as the only danger is coming from those not following the rules and more rules/ registration is not going to stop that as they are already proving they do not follow rules!

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

No,

Please comment:

There is a perfectly workable framework in place with the basic (safe/ low risk operations) being clearly spelled out by the current Part 101 rules - the only issue is that these rules are not being followed - that being the case given those that are currently acting unsafely are clearly not following the current rules having more rules and measures for them not to follow (as that is how they obviously operate to cause any issues) is not going to help - as they won't follow the new rules or the existing rules so all you are doing is punishing those that are already operating safely and following the rules. The current rules are not broken and if followed lead to exact outcomes you are trying to achieve - there is no need for more rules.

Q10

Are there any other problems and opportunities you can think of?

education needs to be more of a focus to make everyone aware of the responsibilities of drone operation. MFNZ is a good organisation that has been around a very long time and focuses on the safe operation of drones so has the facilities and training designed to encourage and promote safe operation. This has been the case prior to any rules being created around drones and continues to do so - it seems pointless to interfere with a working model. Yes there are issues but they are not in any way related to those operating within the MFNZ framework. Safety is one of the big focus items in MFNZ training and operations

Q11

Do you agree with the proposed order of implementation of the measures?

No,

Please comment:

As above I do not believe the proposed measures will have the desired effect so I believe there needs to be more of an education and policing focus to make sure everyone is aware of the rules and that there are implications in not following them and if you decide not to obide by the rules you will face consequences

Page 4

Q12

Should drones have their own standalone Rule Part?

No ,

Please comment:

I do not believe it is necessary although if we are wanting to break things down then there needs to be more specific exemptions from operating from MFNZ fields - the location of all of them which needs to be kept up to date on the maps and a hazard control zone around them of at least 2km as we do not want drone flights straying into those safe areas unannounced.

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

No ,

Please comment:

I believe there needs to be an easily identifiable for the lay man restriction around airfields. I recognise there are parts of the airfield where 4km is too much as there is no flying activity that low or close in (the sides of the active runway for example) but this could lead to some confusion and end up someone inadvertently flying a drone too close to an active area - at 4km away full size aircraft are easily able to attain a safe altitude to ensure we have a good separation.

Q14

Should we change the requirement to gain consent to fly above property?

No – keep the existing consent provision,

Please comment:

I believe we should try and be responsible and let those we are flying above know that is what we are doing - this helps avoid lots of reports as the people are aware what is happening so can be more at ease with the operation - I believe if a drone suddenly appears over you with no fore warning a person is likely to be shocked and agitated rather than the expectant if they are forewarned.

Q15

Should we change the requirement to gain consent to fly above people?

No – keep the existing requirement,

Please comment:

I believe as part of being a responsible operator as common courtesy we should make every attempt to let people know we are planning to operate above them - I know a lot of people are not comfortable being underneath something in case something were to go wrong or something falls off.

Q16

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

30 metres

Q17

Are there any other major Rules changes we should consider?

no

Q18

Are there any minor changes to the Rules that would make them easier for you to understand?

No ,

Please comment:

The current rules (parts 101 & 102) are very clear and simple and give the best chance of getting a lay man to understand what is required and are easy enough to comply with that they would feel more compelled to comply. As rules get more and more explicit and more and more regulation it starts looking like a hassle and too difficult to comply with so people start thinking they'll give it a miss.

Q19

What do you think of the proposed minor Rules changes?

I'm not a fan - I think as a responsible user and general courtesy effort should be made to get permissions and I believe that is part of the operating safely as you get an idea of where you are flying as you've checked it prior to flying to get permissions.

Q20

Are there any other changes we should consider?

no

Page 5

Q21

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Yes,

Please comment:

As a MFNZ member there are those expectations of getting qualification and on turning up to their sites safety is spelled out with hazards identified and that culture is reinforced throughout the training practices and so a basic qualification is a good step.

Q22

What impact would a basic pilot qualification likely have on you?

None as I have a Qualification through MFNZ

Q23

What format should this test take?

Electronic/online theory test

Q24

Should there be a minimum age for basic pilot qualification?

No

Q25

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Yes,

Please comment:

I believe we need to recognise and give authorisations to proven training organisations

Q26

Is there any other special authorisations you would like to see?

no

Page 6

Q27

Should we introduce the proposed drone registration system?

No,

Please comment:

I believe the horse has already bolted - there are thousands of drones out there and those that are going to cause issues are not going to register their drones - all this is doing is putting an undue cost and hassle on those who are already following the rules - those that do not follow the rules now will not follow them in the future and all this is going to do is to add hassle which some who do follow the current rules will find too much and not follow

Q28

What impact would drone registration likely have on you?

a lot of implementation - currently as proposed not much as I fly at a MFNZ site exclusively but if this were to include drones at those sites there would be 50 + applications required which would be a hassle

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

again it's a nice thought but it is not going to result in the desired outcome as those that do not follow the rules will not follow the correct procedures here either so will not adhere and with the number of drones already out there and the ease of import this is not going to actually work.

Q30

Should there be a minimum weight threshold for registering a drone?

Yes, but with a different weight as the threshold ,

Please comment:

250g seems too light I believe this should be only applied to the same limits as requiring 102 certification or at least 2kg. I understand the reasoning as a 2kg craft at speed could cause significant damage but so can a .303 bullet and that is a lot less than 250g. It seems that a better threshold would be related to a momentum rating as in the weight x the maximum velocity as it is those factors that determine how much damage an item can do (there are also things like the material at the front etc as a 2KG block of foam hitting an object at 50 km/h does a lot less damage than a 2kg brick hitting an object at 50km/h)

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Q31

Should certain drones not need to be registered (select all that apply)

Yes, drones flown solely indoors,

Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)

Please comment:

drones flown indoors are contained and therefore less likely to cause damage and certainly not likely to damage anything outside the building they are being flown in. Similarly with the safety culture and area setup of a MFNZ site drones flown at those facilities are less likely to cause issues - the flying site is shown on maps so full size are aware of the activity - MFNZ members have specifically selected the site as to be clear of hazards, people and anything that could be harmed by it's operation so as to be as sure as possible that no harm will come from drone activity in that area.

Page 7

Q32

Should we introduce remote ID?

No,

Please comment:

again this is only going to be followed by those currently operating safely and within the rules - those that do not adhere to the current rules are not going to adhere to the drone ID rules and there are many thousands of drones already out there there the horse has bolted so it's too late to shut the gate.

Q33

What impact would remote ID likely have on you?

a large impact - 50+ ID's to try and source and there would be difficulty in installation as to find a spot not likely to be in the way of anything - not interfere or block the radio signal or affect the center of balance which in a number of models could be difficult - also many models are scaled down versions of full size aircraft and don't want anything to detract from the appearance.

Page 8

Q34

Should we consider introducing geo-awareness?

Yes,

Please comment:

one easily accessed and clear map showing all hazards would be great to show laymen where it is safe to fly and where not to fly - currently there is a collection of maps and not one is fully complete so it is very hard for drone or full size operators to know for sure if an area is safe to fly without a lot of effort.

Q35

What impact would geo-awareness likely have on you?

It would be good so the MFNZ sites had a boundary (say 2km) around them to alert other drone users to their existence so that drones don't meet in the middle somewhere

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Again some of the major reasoning behind the proposed rules needs to be looked at as the Gatwick Airport shutdown as mentioned earlier was not actually caused by a drone but the reporting of a drone and this reporting has subsequently been proven to be false so that is the issue - not the drones but the false reporting of drones.

Yes like everything there are operators who do not follow the rules (look at the roads and the whole need for a police department - if everyone followed the rules their role would be redundant but sadly there are always those that do not). What we need is policing of the current rules as if everyone was following them we would have no issues.

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

PROACTIVELY RELEASED BY
THE MINISTRY OF TRANSPORT

#32

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, May 19, 2021 1:25:16 PM
Last Modified: Wednesday, May 19, 2021 1:53:40 PM
Time Spent: 00:28:23
IP Address: [REDACTED]

Page 1

Q1 Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Javier Canete

Q3

Email address

[REDACTED]

Q4 Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

I do provide aerial imagery and other aerial services, specially related to photogrammetry. I am a NZ certified drone pilot and I expect to obtained a full 102 company certification within the next year or so.

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

I support the proposed measures. However, I think that a more clear authorisation framework (None CAA related) related to other institutions, such as councils, NZTA, DOC, among others, who are in control of roads, parks, coastal settings needs to be established. As a commercial UAV pilot I find it hard to know every single institution UAV framework/permission procedure. This is sometimes misleading and does not help to better organise and track UAV operations. Furthermore, sometimes rules from one institution overwrite others which is very confusing.

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

Yes, with changes ,

Please comment::

Just like aircraft pilots, experience plays an important role while conducting an AUV operation. We can not expect the same awareness from everyone based only in a desktop course and a short flight assessment. Flying time should be recognise, using perhaps categories according to every individual experience. This could be beneficial in the medium long-term.

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

Yes

Q10

Are there any other problems and opportunities you can think of?

Respondent skipped this question

Q11

Do you agree with the proposed order of implementation of the measures?

Yes

Page 4

Q12

Should drones have their own standalone Rule Part?

Yes

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

Yes

Q14

Should we change the requirement to gain consent to fly above property?

Yes – relax the consent provision in another way

Q15 Yes – use 'safe distances' as an alternative

Should we change the requirement to gain consent to fly above people?

Q16 10 metres

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Q17
Are there any other major Rules changes we should consider?

No

Q18 I don't know

Are there any minor changes to the Rules that would make them easier for you to understand?

Q19
What do you think of the proposed minor Rules changes?
I agreed with them in general. I however would not relax the rules around "the spotter/observer requirements for First-Person View"

Q20
Are there any other changes we should consider?

No

Page 5

Q21 I don't know

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Q22
What impact would a basic pilot qualification likely have on you?

None. I am already qualified.

Q23 A practical examination of skill and a paper based written theory test (at a provider)

What format should this test take?

Q24

Yes, 16 years

Should there be a minimum age for basic pilot qualification?

Q25

Yes

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Is there any other special authorisations you would like to see?

I don't know

Page 6

Q27

Yes

Should we introduce the proposed drone registration system?

Q28

What impact would drone registration likely have on you?

None

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

I agreed

Q30

Yes, but with a different weight as the threshold

Should there be a minimum weight threshold for registering a drone?

Q31

Yes, drones flown solely indoors

Should certain drones not need to be registered (select all that apply)

Page 7

Q32

Yes

Should we introduce remote ID?

Q33

What impact would remote ID likely have on you?

None

Page 8

Q34

Yes

Should we consider introducing geo-awareness?

Q35

What impact would geo-awareness likely have on you?

None

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

No

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

PROACTIVELY RELEASED BY
THE MINISTRY OF TRANSPORT

#33

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, May 19, 2021 1:20:15 PM
Last Modified: Wednesday, May 19, 2021 1:55:29 PM
Time Spent: 00:35:13
IP Address: [REDACTED]

Page 1

Q1 Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Toby

Q3

Email address

Q4

Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

I'm interested in flying drones.

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

Page 3

PROACTIVELY RELEASED BY
THE MINISTRY OF TRANSPORT

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

The current four-kilometer minimum distance to airports is too restrictive: for example the vast majority of Wellington is too close to the airport. This requirement should be significantly relaxed.

The proposed "safe distances" requirement for flying above property or people makes sense, and I would prefer setting that at 10m/25feet (like in the US). Alternatively this requirement could be removed entirely.

When it comes to drone identification/remote ID, I'm very concerned about the effect on low-cost/DIY drones. I'm strongly opposed to requiring remote ID capabilities. I'm also opposed to a drone registration system: this would impose significant costs and barriers to using drones for little benefit.

It would be very nice if FPV systems could be used as an alternative to line-of-sight.

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

Yes, with changes

Please comment:

Requiring remote ID and/or drone registration would significantly increase costs without real benefit. I hope this will be reconsidered.

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

Yes, with changes

Q10

Are there any other problems and opportunities you can think of?

Respondent skipped this question

Q11

Do you agree with the proposed order of implementation of the measures?

Yes

Page 4

Q12

Should drones have their own standalone Rule Part?

No

Please comment:

No need for this.

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

Yes

Please comment:

Please significantly reduce this requirement: for example large parts of Wellington are too close to the airport, and requiring a four-kilometer distance is frankly ridiculous.

Enabling Drone Integration

Q14 **Yes – remove the consent provision completely,**

Should we change the requirement to gain consent to fly above property?

Please comment:

Either remove the provision entirely or use safe distances, perhaps similar to the US (7m/25ft)

Q15 **Yes – remove the requirement completely,**

Should we change the requirement to gain consent to fly above people?

Please comment:

Either remove the provision entirely or use safe distances (7m/25ft for example).

Q16 **10 metres**

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Q17 **Respondent skipped this question**

Are there any other major Rules changes we should consider?

Q18 **No**

Are there any minor changes to the Rules that would make them easier for you to understand?

Q19

What do you think of the proposed minor Rules changes?

Relaxing the observer/spotter requirement for FPV would be nice.

Q20 **Respondent skipped this question**

Are there any other changes we should consider?

Page 5

Q21 **No,**

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Please comment:

This would be a significant burden on people using drones, and it is not necessary.

Q22

What impact would a basic pilot qualification likely have on you?

It would be an annoying extra step to using drones.

Q23

Electronic/online theory test

What format should this test take?

Q24

No

Should there be a minimum age for basic pilot qualification?

Q25

I don't know

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27

No,

Please comment:

I'm very concerned about the burden of registering drones, and the associated costs.

Should we introduce the proposed drone registration system?

Q28

Respondent skipped this question

What impact would drone registration likely have on you?

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

I am strongly opposed to this. Especially identity authentication should *NOT* be part of this.

Q30

Yes, but with a different weight as the threshold ,

Please comment:

Use a higher weight threshold.

Should there be a minimum weight threshold for registering a drone?

Q31

Yes, drones flown solely indoors,

Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)

,

Yes, others (please specify below)

Should certain drones not need to be registered (select all that apply)

Page 7

Enabling Drone Integration

Q32

Should we introduce remote ID?

No,

Please comment:

Increases costs, and is not necessary.

Q33

What impact would remote ID likely have on you?

Respondent skipped this question

Page 8

Q34

Should we consider introducing geo-awareness?

No,

Please comment:

Creating a digital map makes sense, but there should be no requirements for drones themselves to use geo-awareness.

Q35

What impact would geo-awareness likely have on you?

Respondent skipped this question

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Respondent skipped this question

Q37

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

Respondent skipped this question

PROACTIVELY RELEASED BY
THE MINISTRY OF TRANSPORT

#34

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, May 19, 2021 2:04:41 PM
Last Modified: Wednesday, May 19, 2021 2:23:43 PM
Time Spent: 00:19:01
IP Address: [REDACTED]

Page 1

Q1 **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Ray Calcutt

Q3

Email address

[REDACTED]

Q4

Who are you submitting on behalf of?

Other,

If you are not submitting as an individual, please specify who you represent.:

Auckland Live and Conventions Auckland Stadiums

Q5

Briefly tell us your interest in drones

I process the Drone permits for our venues and events

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

PROACTIVELY RELEASED BY THE MINISTRY OF TRANSPORT

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Maintain Land Owners Consent for all Drone use

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

No,

Please comment::

The Rules are largely ignored or not known now how will updates be any better

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

No,

Please comment:

I regularly get applications to use drones where operator has nil knowledge of the rules and conditions .Clients are engaging cheapest not the most competent .

Q10

Are there any other problems and opportunities you can think of?

How will the Patrons at large events both free and ticketed from Drones intruding on their enjoyment of such events .

How will Performers and promoters IP be protected from unauthorised drones capturing vision .We have had TV and Press drones operating in breach of current rules with nil Police action .

Q11

Do you agree with the proposed order of implementation of the measures?

No

Page 4

Q12

Should drones have their own standalone Rule Part?

No ,

Please comment:

Land owners consent is our only method to control drone usage over our events .

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

No

Q14

Should we change the requirement to gain consent to fly above property?

No – keep the existing consent provision,

Please comment:

How else can we as a venue provider ensure the IP and Commercial Knowledge if unauthorised Drones are capturing vision of such matters .

Q15

No – keep the existing requirement

Should we change the requirement to gain consent to fly above people?

Q16

50 meters

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Q17

Respondent skipped this question

Are there any other major Rules changes we should consider?

Q18

Respondent skipped this question

Are there any minor changes to the Rules that would make them easier for you to understand?

Q19

Respondent skipped this question

What do you think of the proposed minor Rules changes?

Q20

Respondent skipped this question

Are there any other changes we should consider?

Page 5

Q21

Yes

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Q22

What impact would a basic pilot qualification likely have on you?

Some surety of rules and competence.

Q23

A practical examination of skill and a paper based written theory test (at a provider)

What format should this test take?

Q24

Yes, 16 years

Should there be a minimum age for basic pilot qualification?

Q25

Yes

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27

Yes

Should we introduce the proposed drone registration system?

Q28

What impact would drone registration likely have on you?

We can identify drones intruding into the area over patrons and forcing authorised Drones to cease operation for safety Reasons.660 concert at Western springs had 2 authorised and permitted drones that had to cease operation at times when intruder drones entered same airspace .We tracked intruders and took vision of operator and place of launch

Q29

Respondent skipped this question

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Q30

Yes, with 250 grams as the weight threshold

Should there be a minimum weight threshold for registering a drone?

Q31

Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)

Should certain drones not need to be registered (select all that apply)

Page 7

Q32

Yes

Should we introduce remote ID?

Q33

Respondent skipped this question

What impact would remote ID likely have on you?

Page 8

Q34 **Yes,**
Should we consider introducing geo-awareness? Please comment:
Enable the airspace over events to be safely managed

Q35 **Respondent skipped this question**
What impact would geo-awareness likely have on you?

Page 9

Q36 **Respondent skipped this question**
Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Q37 **Respondent skipped this question**
If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

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#35

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, May 19, 2021 2:12:32 PM
Last Modified: Wednesday, May 19, 2021 2:28:09 PM
Time Spent: 00:15:37
IP Address: [REDACTED]

Page 1

Q1 Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Peter Kirby

Q3

Email address

[REDACTED]

Q4

Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

Recreational modeller (MFNZ) and occasional commercial drone operator with a wings badge within 101 guidelines.

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

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Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Online training will help but people will still whatever they like, ignoring rules if that is how they feel (like car speeding). No increase of rules will stop the few that choose to ignore sensible guidelines.

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

Yes,

Please comment::

But you will never stop all idiots. The vast majority behave now. More rules or easier-to-sit exams won't stop those that do not care. 101 certified before purchasing a 'drone'. I want to see that.

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

Yes, with changes

Q10

Are there any other problems and opportunities you can think of?

Respondent skipped this question

Q11

Do you agree with the proposed order of implementation of the measures?

Yes

Page 4

Q12

Should drones have their own standalone Rule Part?

Yes,

Please comment:

Majority of drones are recreational. Large drones/courier or man-carrying dreamers are so different that they should have their own standalone category.

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

No

Q14

Should we change the requirement to gain consent to fly above property?

Yes – use 'safe distances' as an alternative

Q15

Should we change the requirement to gain consent to fly above people?

Yes – use 'safe distances' as an alternative

Q16 **30 metres**

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Q17 **Respondent skipped this question**

Are there any other major Rules changes we should consider?

Q18 **No**

Are there any minor changes to the Rules that would make them easier for you to understand?

Q19 **Respondent skipped this question**

What do you think of the proposed minor Rules changes?

Q20 **Respondent skipped this question**

Are there any other changes we should consider?

Page 5

Q21 **Yes**

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Q22

What impact would a basic pilot qualification likely have on you?

Nil. I am MFNZ Wings badge holder, aircraft/helicopter/instructor + recreational microlight pilot.

Q23 **Electronic/online theory test**

What format should this test take?

Q24 **No**

Should there be a minimum age for basic pilot qualification?

Q25 **Yes**

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27

Should we introduce the proposed drone registration system?

No,

Please comment:

Over the top for models below 25Kg. People simply won't do it.

Q28

What impact would drone registration likely have on you?

Minimal.

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

No. Again, people just won't do it, despite the rules. Expensive and complicated.

Q30

Should there be a minimum weight threshold for registering a drone?

Yes, but with a different weight as the threshold ,

Please comment:

Over 25Kg.

Q31

Should certain drones not need to be registered (select all that apply)

Yes, drones flown solely indoors,

Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)

Yes, others (please specify below),

Please comment:

Below 25Kg

Page 7

Q32

Should we introduce remote ID?

No

Q33

What impact would remote ID likely have on you?

I wouldn't for the minimal flying I do.

Page 8

Q34

Should we consider introducing geo-awareness?

No,

Please comment:

Just another rule that people would ignore.

Q35

What impact would geo-awareness likely have on you?

Nil

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Respondent skipped this question

Q37

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

Respondent skipped this question

PROACTIVELY RELEASED BY
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#36

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, May 19, 2021 1:34:48 PM
Last Modified: Wednesday, May 19, 2021 2:31:10 PM
Time Spent: 00:56:21
IP Address: [REDACTED]

Page 1

Q1 Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Alan Flynn

Q3

Email address

Q4

Who are you submitting on behalf of?

Local government,

If you are not submitting as an individual, please specify who you represent.:

Masterton District Council

Q5

Briefly tell us your interest in drones

I fly drones to capture vertical and oblique aerial photography and video for a variety of internal task requests

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

Page 3

Q7 Respondent skipped this question

What is your view on the proposed series of measures?
Are there any other alternatives you suggest we consider?

Q8 Yes, with changes

Do you think the proposed series of measures would help achieve the desired objectives?

Q9 Yes, with changes

Do you think the proposed series of measures would address the problems and opportunities identified?

Q10 Respondent skipped this question

Are there any other problems and opportunities you can think of?

Q11 Yes

Do you agree with the proposed order of implementation of the measures?

Page 4

Q12 Yes,
Please comment:

Should drones have their own standalone Rule Part? It would make it easier for those not familiar with the Rules system to locate the rules. It would also enable easier separation of model aircraft rules (and other unmanned aerial craft) to those of drones

Q13 Yes,
Please comment:

Should we review the four-kilometre minimum flight distance from aerodromes? Masterton urban area is completely covered by Hood Aerodrome and Wairarapa DHB 4km zones, making every flight (other than shielded) require written permission from 2 agencies prior to the flight. This is time consuming and as at least 24 hours notice is required, unless there is a settled high pressure system in place, it is very hard to predict safe flying weather in advance. Restrictions should be similar to the DJI Blue Zones, but more refined to match approach fans etc.

Q14

Should we change the requirement to gain consent to fly above property?

Yes – use 'safe distances' as an alternative,

Please comment:

This is very important to the type of work councils need to do to check on compliance with other legislation (Building Act, District Plan rules etc.) Where we should be using a drone, we have to use a full-sized fixed wing or helicopter from an organisation with Part 135, which in turn is less flexible in terms of time, adds significant cost to ratepayers, and adds significant risk in terms of potential for damage/injury/loss of life if something does go wrong, as it is unlikely consent would be given in these type of examples, and our organisation size does not warrant the cost of going to Part 102

Q15

Should we change the requirement to gain consent to fly above people?

Yes – use 'safe distances' as an alternative

Q16

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

30 metres

Q17

Are there any other major Rules changes we should consider?

Respondent skipped this question

Q18

Are there any minor changes to the Rules that would make them easier for you to understand?

Respondent skipped this question

Q19

What do you think of the proposed minor Rules changes?

Respondent skipped this question

Q20

Are there any other changes we should consider?

Respondent skipped this question

Page 5

Q21

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Yes

Q22

What impact would a basic pilot qualification likely have on you?

None, I have completed a 3 day drone qualification from Massey Aviation, and have 40 years experience in the aviation system.

Q23

Electronic/online theory test

What format should this test take?

Q24

Yes, 14 years

Should there be a minimum age for basic pilot qualification?

Q25

Yes

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Is there any other special authorisations you would like to see?

I think there should be a different level of qualification for those using drones commercially. Even though the risks may be the same, the way drones are used commercially is considerably different to the way most recreational drone pilots use them. Something like the 3 day Massey course (including the flying skills test) should be required for those using drones commercially.

Page 6

Q27

Should we introduce the proposed drone registration system?

Yes, with changes,

Please comment:

I think the weight threshold should be slightly higher. As an example, common mallard ducks weigh from 0.75 to 1.5kg and are arguably more of a threat to aircraft than slower flying drones. I suggest something like under 0.75kg should be registration exempt.

Q28

What impact would drone registration likely have on you?

Small inconvenience

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Need more info (such as will there be the grandfathering clause for existing drones that can not have the tech added)

Q30

Should there be a minimum weight threshold for registering a drone?

Yes, but with a different weight as the threshold ,

Please comment:

I think the weight threshold should be slightly higher. As an example, common mallard ducks weigh from 0.75 to 1.5kg and are arguably more of a threat to aircraft than slower flying drones. I suggest something like under 0.75kg should be registration exempt.

Q31

Should certain drones not need to be registered (select all that apply)

Yes, drones flown solely indoors,

Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)

,

Yes, others (please specify below),

Please comment:

Drones that are toys and can not be flown more than say 30m away from the person controlling it.

Page 7

Q32

Should we introduce remote ID?

Yes

Q33

What impact would remote ID likely have on you?

Would need new drone

Page 8

Q34

Should we consider introducing geo-awareness?

Yes

Q35

What impact would geo-awareness likely have on you?

There may need to be easier ways of contacting owners of these sites if required and some flexibility

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

As a local government council drone operator, the limitations of the current rules do not fit well with getting the best from the drone tech. I would like to see an option between Part 101 and 102 for local government operations that enables flexibility to match our required needs to enact our roles using other legislation and plans etc.

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

PROACTIVELY RELEASED BY
THE MINISTRY OF TRANSPORT

#37

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, May 19, 2021 2:33:05 PM
Last Modified: Wednesday, May 19, 2021 2:44:26 PM
Time Spent: 00:11:20
IP Address: [REDACTED]

Page 1

Q1 Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Bazz Aldersley

Q3

Email address

[REDACTED]

Q4

Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

Making videos.

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

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Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

I do not like it, as its additional money I'd have to spend, when I already follow the rules.

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

No,

Please comment::

People are idiots, they do what they want regardless.

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

No,

Please comment:

As above.

Q10

Are there any other problems and opportunities you can think of?

Problem is idiots.

Q11

Do you agree with the proposed order of implementation of the measures?

No,

Please comment:

As above.

Page 4

Q12

Should drones have their own standalone Rule Part?

Yes,

Please comment:

Allow more places to be used, with rules in place.

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

Yes,

Please comment:

Stops us flying alot of cool places.

Q14

Should we change the requirement to gain consent to fly above property?

Yes – remove the consent provision completely,

Please comment:

Can look in to people's yards without going over them, so this rule has never made sense to me.

Q15

Should we change the requirement to gain consent to fly above people?

Yes – remove the requirement completely,

Please comment:

Just stupid in the first place.

Q16

10 metres

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Q17

Are there any other major Rules changes we should consider?

Line of sight, because of you were on a farm or in the country far from any planes, you could get some cool shots.

Q18

Are there any minor changes to the Rules that would make them easier for you to understand?

Yes,

Please comment:

Make every drone sold come with a DVD that clearly states everything.

Q19

What do you think of the proposed minor Rules changes?

Maybe?

Q20

Are there any other changes we should consider?

Maybe?

Page 5

Q21

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

I don't know,

Please comment:

Maybe, depends if it will get cheaper than \$700.

Q22

What impact would a basic pilot qualification likely have on you?

Cost me money and time.

Q23

Electronic/online theory test

What format should this test take?

Q24

Should there be a minimum age for basic pilot qualification?

Yes, other age (please specify):

18, adults only makes sense without supervision.

Q25

I don't know

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Is there any other special authorisations you would like to see?

No.

Page 6

Q27

Should we introduce the proposed drone registration system?

No,
Please comment:
Invasion of privacy.

Q28

What impact would drone registration likely have on you?

It would put me off droning.

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Don't like it.

Q30

Should there be a minimum weight threshold for registering a drone?

Yes, but with a different weight as the threshold ,
Please comment:
Maybe 1kg and under, no registration.

Q31

Should certain drones not need to be registered (select all that apply)

Yes, drones flown solely indoors

Page 7

Q32

Should we introduce remote ID?

No

Q33

What impact would remote ID likely have on you?

Wouldn't like it.

Page 8

Q34

Should we consider introducing geo-awareness?

I don't know,
Please comment:
Maybe?

Q35

What impact would geo-awareness likely have on you?

Not sure.

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Don't screw it up.

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

PROACTIVELY RELEASED BY
THE MINISTRY OF TRANSPORT

#38

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, May 19, 2021 2:37:19 PM
Last Modified: Wednesday, May 19, 2021 3:33:24 PM
Time Spent: 00:56:04
IP Address: [REDACTED]

Page 1

Q1 **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Steven Wilson

Q3

Email address

[REDACTED]

Q4 **Myself**

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

Using drone for Survey Mapping

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

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Q7 Respondent skipped this question

What is your view on the proposed series of measures?
Are there any other alternatives you suggest we consider?

Q8 Yes

Do you think the proposed series of measures would help achieve the desired objectives?

Q9 Yes

Do you think the proposed series of measures would address the problems and opportunities identified?

Q10
Are there any other problems and opportunities you can think of?

Getting the message to recreational users should be the main priority. From my encounters most people wouldn't have a clue about the rules

Q11 Yes

Do you agree with the proposed order of implementation of the measures?

Page 4

Q12 Yes

Should drones have their own standalone Rule Part?

Q13 Yes

Should we review the four kilometre minimum flight distance from aerodromes?

Q14 Yes – relax the consent provision in another way,

Should we change the requirement to gain consent to fly above property?

Please comment:
I think an attempt should be made to gain consent from the property owner but in cases where you can not or have tried a rule to allow for that is fine.

Q15 Yes – use 'safe distances' as an alternative

Should we change the requirement to gain consent to fly above people?



Q16

50 meters

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Q17

Respondent skipped this question

Are there any other major Rules changes we should consider?

Q18

I don't know

Are there any minor changes to the Rules that would make them easier for you to understand?

Q19

Respondent skipped this question

What do you think of the proposed minor Rules changes?

Q20

Respondent skipped this question

Are there any other changes we should consider?

Page 5

Q21

Yes

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Q22

What impact would a basic pilot qualification likely have on you?

None

Q23

Electronic/online theory test

What format should this test take?

Q24

Yes, 16 years

Should there be a minimum age for basic pilot qualification?

Q25

I don't know

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27

Yes

Should we introduce the proposed drone registration system?

Q28

What impact would drone registration likely have on you?

None

Q29

Respondent skipped this question

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Q30

Yes, with 250 grams as the weight threshold

Should there be a minimum weight threshold for registering a drone?

Q31

Yes, drones flown solely indoors,

Should certain drones not need to be registered (select all that apply)

Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)

Page 7

Q32

I don't know

Should we introduce remote ID?

Q33

Respondent skipped this question

What impact would remote ID likely have on you?

Page 8

Q34

I don't know

Should we consider introducing geo-awareness?

Q35

Respondent skipped this question

What impact would geo-awareness likely have on you?

Page 9

Q36

Respondent skipped this question

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

PROACTIVELY RELEASED BY
THE MINISTRY OF TRANSPORT

#39

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, May 19, 2021 3:48:59 PM
Last Modified: Wednesday, May 19, 2021 3:57:34 PM
Time Spent: 00:08:34
IP Address: [REDACTED]

Page 1

Q1 Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Grant

Q3

Email address

[REDACTED]

Q4

Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

Flying and photography

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

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Q7 Respondent skipped this question

What is your view on the proposed series of measures?
Are there any other alternatives you suggest we consider?

Q8 Yes

Do you think the proposed series of measures would help achieve the desired objectives?

Q9 Yes, with changes

Do you think the proposed series of measures would address the problems and opportunities identified?

Q10 Respondent skipped this question

Are there any other problems and opportunities you can think of?

Q11 Yes

Do you agree with the proposed order of implementation of the measures?

Page 4

Q12 Yes

Should drones have their own standalone Rule Part?

Q13 No

Should we review the four-kilometre minimum flight distance from aerodromes?

Q14 Yes – use 'safe distances' as an alternative

Should we change the requirement to gain consent to fly above property?

Q15 Yes – use 'safe distances' as an alternative

Should we change the requirement to gain consent to fly above people?

Q16 30 metres

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

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Q17

Respondent skipped this question

Are there any other major Rules changes we should consider?

Q18

No

Are there any minor changes to the Rules that would make them easier for you to understand?

Q19

Respondent skipped this question

What do you think of the proposed minor Rules changes?

Q20

Respondent skipped this question

Are there any other changes we should consider?

Page 5

Q21

Yes

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Q22

What impact would a basic pilot qualification likely have on you?

More aware of safety requirements

Q23

Electronic/online theory test

What format should this test take?

Q24

Yes, 16 years

Should there be a minimum age for basic pilot qualification?

Q25

I don't know

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27

Yes

Should we introduce the proposed drone registration system?

Q28

What impact would drone registration likely have on you?

Know that I'm accountable

Q29

Respondent skipped this question

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Q30

Yes, but with a different weight as the threshold

Should there be a minimum weight threshold for registering a drone?

Q31

Yes, drones flown solely indoors,

Should certain drones not need to be registered (select all that apply)

Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)

Page 7

Q32

I don't know

Should we introduce remote ID?

Q33

Respondent skipped this question

What impact would remote ID likely have on you?

Page 8

Q34

I don't know

Should we consider introducing geo-awareness?

Q35

Respondent skipped this question

What impact would geo-awareness likely have on you?

Page 9

Q36

Respondent skipped this question

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

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THE MINISTRY OF TRANSPORT

#40

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, May 19, 2021 8:20:43 AM
Last Modified: Wednesday, May 19, 2021 4:04:10 PM
Time Spent: 07:43:26
IP Address: [REDACTED]

Page 1

Q1 **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Steven Newland

Q3

Email address

[REDACTED]

Q4

Who are you submitting on behalf of?

Other,

If you are not submitting as an individual, please specify who you represent.:

Volcanic Air - Aviation business

Q5

Briefly tell us your interest in drones

Aerodrome Owner

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

Q7 Respondent skipped this question

What is your view on the proposed series of measures?
Are there any other alternatives you suggest we consider?

Q8 Yes

Do you think the proposed series of measures would help achieve the desired objectives?

Q9 Yes

Do you think the proposed series of measures would address the problems and opportunities identified?

Q10 Respondent skipped this question

Are there any other problems and opportunities you can think of?

Q11 Yes

Do you agree with the proposed order of implementation of the measures?

Page 4

Q12 Yes

Should drones have their own standalone Rule Part?

Q13 Yes,
Please comment:
Yes, but reduce the size of the operational area (ie 2km)
Also options for operators to Geofence aerodromes

Should we review the four-kilometre minimum flight distance from aerodromes?

Q14 No – keep the existing consent provision

Should we change the requirement to gain consent to fly above property?

Q15 Yes – use 'safe distances' as an alternative

Should we change the requirement to gain consent to fly above people?

Q16 30 metres

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?



Q17

Respondent skipped this question

Are there any other major Rules changes we should consider?

Q18

No

Are there any minor changes to the Rules that would make them easier for you to understand?

Q19

Respondent skipped this question

What do you think of the proposed minor Rules changes?

Q20

Respondent skipped this question

Are there any other changes we should consider?

Page 5

Q21

Yes

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Q22

What impact would a basic pilot qualification likely have on you?

Understanding to drone operators the rules and regulations

Q23

Electronic/online theory test

What format should this test take?

Q24

Yes, 14 years

Should there be a minimum age for basic pilot qualification?

Q25

Yes

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27

Yes

Should we introduce the proposed drone registration system?

Q28

What impact would drone registration likely have on you?

Accountability and identification of unauthorized flights

Q29

Respondent skipped this question

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Q30

Should there be a minimum weight threshold for registering a drone?

Yes, but with a different weight as the threshold ,
Please comment.

Change weight threshold to 200 grams, lighter drones will be eventually become lighter with the same capabilities

Q31

Yes, drones flown solely indoors

Should certain drones not need to be registered (select all that apply)

Page 7

Q32

Yes

Should we introduce remote ID?

Q33

What impact would remote ID likely have on you?

Ensuring no unauthorized flights

Page 8

Q34

Yes

Should we consider introducing geo-awareness?

Q35

What impact would geo-awareness likely have on you?

Ability to geofence aerodromes

Page 9

Q36

Respondent skipped this question

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

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#41

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, May 19, 2021 5:01:06 PM
Last Modified: Wednesday, May 19, 2021 5:31:37 PM
Time Spent: 00:30:31
IP Address: [REDACTED]

Page 1

Q1 **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Michael Forward

Q3

Email address

[REDACTED]

Q4

Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

Making videos and recreation

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

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Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

I am for anything that would make the hobby safer and enjoyable for everyone... Only hoping for none of this silly over pricing on the hobby

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

No,

Please comment::

People are idiots and they will still try to exploit the rules

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

No,

Please comment:

Same answer as question 2

Q10

Are there any other problems and opportunities you can think of?

People will still purchase a drone and still fly it without any regards for the rules

Q11

Do you agree with the proposed order of implementation of the measures?

No,

Please comment:

People are still going to exploit the rules

Page 4

Q12

Should drones have their own standalone Rule Part?

Yes,

Please comment:

Why should they have the same rules as a aircraft?

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

Yes,

Please comment:

Maybe set it to 2 - 3 km

Q14

Should we change the requirement to gain consent to fly above property?

Yes – use 'safe distances' as an alternative

Q15

Should we change the requirement to gain consent to fly above people?

Yes – use 'safe distances' as an alternative

Q16

30 metres

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Q17

Respondent skipped this question

Are there any other major Rules changes we should consider?

Q18

I don't know

Are there any minor changes to the Rules that would make them easier for you to understand?

Q19

Respondent skipped this question

What do you think of the proposed minor Rules changes?

Q20

Respondent skipped this question

Are there any other changes we should consider?

Page 5

Q21

No

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Q22

What impact would a basic pilot qualification likely have on you?

A financial one... Maybe lowering the price of it

Q23

Electronic/online theory test

What format should this test take?

Q24

Yes, other age (please specify):

18

Should there be a minimum age for basic pilot qualification?

Q25

No

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27

No

Should we introduce the proposed drone registration system?

Q28

What impact would drone registration likely have on you?

My privacy

Q29

Respondent skipped this question

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Q30

Yes, but with a different weight as the threshold ,

Should there be a minimum weight threshold for registering a drone?

Please comment:

Over 1kg

Q31

No

Should certain drones not need to be registered (select all that apply)

Page 7

Q32

No

Should we introduce remote ID?

Q33

What impact would remote ID likely have on you?

My privacy

Page 8

Q34

Yes

Should we consider introducing geo-awareness?

Q35

What impact would geo-awareness likely have on you?

None

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Not at this point

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

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#42

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, May 19, 2021 5:10:21 PM
Last Modified: Wednesday, May 19, 2021 5:34:21 PM
Time Spent: 00:23:59
IP Address: [REDACTED]

Page 1

Q1 Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Laurie Winter

Q3

Email address

[REDACTED]

Q4 Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

I am a hobby photographer, I have a small drone with a camera that I use for landscape photography, non commercial.

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Having read the submission document, I think the proposals are fair.

Q8

Yes

Do you think the proposed series of measures would help achieve the desired objectives?

Q9

Yes

Do you think the proposed series of measures would address the problems and opportunities identified?

Q10

Are there any other problems and opportunities you can think of?

The blanket rule around flying over conservation land feels heavy handed and unfair. I understand the need to restrict wildlife sensitive, national parks and high tourism areas, but DOC have taken a one-size-fits-all approach and I think it would be possible to consider some DOC areas could be suitable for drone operation.

Q11

Yes

Do you agree with the proposed order of implementation of the measures?

Page 4

Q12

Should drones have their own standalone Rule Part?

Yes,

Please comment:

This would give far greater flexibility, as they are such a distinctly different type of aircraft and it is madness to try to apply blanket rules

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

I don't know,

Please comment:

The challenge will be knowing what is ok and what is not. At least at the moment it is easy to interpret.

Q14

Should we change the requirement to gain consent to fly above property?

Yes – use 'safe distances' as an alternative,

Please comment:

Strongly support this

Q15

Should we change the requirement to gain consent to fly above people?

Yes – use 'safe distances' as an alternative,

Please comment:

Make it so you must fly at a height where property is largely indistinguishable, and where people are unable to be identified - the rule currently is way too restrictive. The "reasonable expectation of privacy" rules should continue to apply.

Q16

30 metres

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Q17

Are there any other major Rules changes we should consider?

Department of Conservation operation

Q18

I don't know

Are there any minor changes to the Rules that would make them easier for you to understand?

Q19

Respondent skipped this question

What do you think of the proposed minor Rules changes?

Q20

Are there any other changes we should consider?

Consider requiring Part 101 drones coming into NZ to be height restricted to 120m.

Also, take action against NZ tourism boards/operators who use illegal drone shots to promote their region or activity. For example, the Rotorua NZ Instagram page sharing drone photos from Kuirau Park which is right next to Rotorua Hospitals heli pad.

Page 5

Q21

Yes

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Q22

What impact would a basic pilot qualification likely have on you?

I would be happy to do a basic qualification

Q23

Electronic/online theory test

What format should this test take?

Q24

Should there be a minimum age for basic pilot qualification?

Yes, other age (please specify):
16 years, but allow under 14 to fly with an adult who is qualified

Q25

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

I don't know

Q26

Is there any other special authorisations you would like to see?

Respondent skipped this question

Page 6

Q27

Should we introduce the proposed drone registration system?

Yes

Q28

What impact would drone registration likely have on you?

Fee, if there was one. I would very much dislike an annual cost, or a requirement to submit flight plans.

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Fine

Q30

Should there be a minimum weight threshold for registering a drone?

Yes, with 250 grams as the weight threshold

Q31

Should certain drones not need to be registered (select all that apply)

Yes, drones flown solely indoors

Page 7

Q32

Yes

Should we introduce remote ID?

Q33

What impact would remote ID likely have on you?

None, but I feel annoyed that many of my fellow pilots routinely fly over 120m

Page 8

Q34

Yes

Should we consider introducing geo-awareness?

Q35

What impact would geo-awareness likely have on you?

Easier to work out where I can and can not fly

Page 9

Q36

Respondent skipped this question

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

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#43

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, May 19, 2021 5:21:05 PM
Last Modified: Wednesday, May 19, 2021 5:34:42 PM
Time Spent: 00:13:36
IP Address: [REDACTED]

Page 1

Q1 Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Bradley Pennefather

Q3

Email address

[REDACTED]

Q4 Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

I am a Commercial pilot and the safety of the utilisation of drones could be hazardous to GA pilots

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Sufficient

Q8

Yes, with changes

Do you think the proposed series of measures would help achieve the desired objectives?

Q9

Yes, with changes

Do you think the proposed series of measures would address the problems and opportunities identified?

Q10

Are there any other problems and opportunities you can think of?

Helicopters can land anywhere, anytime. Drones can also be flown outside 4nm of an airport but this doesn't prevent them being used near a accident or somewhere that's not geofenced. There needs to be some hefty fines /penalties and have them enforced if used near aircraft.

Q11

Yes

Do you agree with the proposed order of implementation of the measures?

Page 4

Q12

Yes

Should drones have their own standalone Rule Part?

Q13

No ,

Should we review the four-kilometre minimum flight distance from aerodromes?

Please comment:
I think it should be increased.

Q14

No – keep the existing consent provision

Should we change the requirement to gain consent to fly above property?

Q15

No – keep the existing requirement

Should we change the requirement to gain consent to fly above people?

Enabling Drone Integration

Q16

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Other (please specify):

100m

Q17

Are there any other major Rules changes we should consider?

Respondent skipped this question

Q18

Are there any minor changes to the Rules that would make them easier for you to understand?

I don't know

Q19

What do you think of the proposed minor Rules changes?

Respondent skipped this question

Q20

Are there any other changes we should consider?

Increasing the penalty for flights near aircraft or approach paths.

Making the training mandatory and not just a two hour presentation.

Page 5

Q21

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Yes, with changes

Q22

What impact would a basic pilot qualification likely have on you?

Respondent skipped this question

Q23

What format should this test take?

A practical examination of skill and a paper based written theory test (at a provider)

Q24

Should there be a minimum age for basic pilot qualification?

Yes, 16 years

Q25

Yes

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27

Yes

Should we introduce the proposed drone registration system?

Q28

What impact would drone registration likely have on you?

Easier to track someone flying one

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Definitely.

Q30

Should there be a minimum weight threshold for registering a drone?

Yes, but with a different weight as the threshold ,

Please comment:

Lower the weight threshold. All drones should be registered

Q31

No

Should certain drones not need to be registered (select all that apply)

Page 7

Q32

Yes

Should we introduce remote ID?

Q33

Respondent skipped this question

What impact would remote ID likely have on you?

Page 8

Enabling Drone Integration

Q34

Should we consider introducing geo-awareness?

Yes,

Please comment:

This would make it impossible for drones to be within the 4 mile radius of an airport

Q35

What impact would geo-awareness likely have on you?

Respondent skipped this question

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Respondent skipped this question

Q37

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

Respondent skipped this question

PROACTIVELY RELEASED BY
THE MINISTRY OF TRANSPORT

#44

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, May 19, 2021 5:09:10 PM
Last Modified: Wednesday, May 19, 2021 5:39:45 PM
Time Spent: 00:30:34
IP Address: [REDACTED]

Page 1

Q1 Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Aidan

Q3

Email address

Q4

Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

Part 101 drone operator

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

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Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

I do not support any changes in which the financial onus of any changes are passed on to part 101 pilots as with the basic pilot qualification.

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

Yes, with changes ,

Please comment::

as above I do not support any changes in which the financial onus of any changes are passed on to part 101 pilots as with the basic pilot qualification.

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

Yes, with changes

Q10

Are there any other problems and opportunities you can think of?

Financial implications on hobbyist pilots

Q11

Do you agree with the proposed order of implementation of the measures?

No,

Please comment:

No, as I do not agree with the measures

Page 4

Q12

Should drones have their own standalone Rule Part?

Yes

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

Yes,

Please comment:

4km is a very long range which is beyond visual sight in most circumstances

Q14

Should we change the requirement to gain consent to fly above property?

Yes – relax the consent provision in another way,

Please comment:

Height above property should be the focus, 'distance' is ambiguous in regards to vertical vs. horizontal

Q15

Should we change the requirement to gain consent to fly above people?

Yes – relax the requirement in another way,

Please comment:

'above people' is very vague, as it is interpreted by many as meaning nearby vs. directly overhead but should rather focus on what risk there actually is to the people below if the drone were to lose control and the measures in place to try to avoid collision. 'Safe distances' is also very subjective depending on the drone in question and the capacity in which it is being operated

Q16

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Other (please specify):

It would have to depend on the weight / risk of impact / safety measures of the drone

Q17

Are there any other major Rules changes we should consider?

When multiple aerodromes overlap getting approval from all needs to be handled in a more straightforward way, and contact with part 101 pilots needs to be timely. Further, MoT approval should not be required to fly over roads for brief periods when operating safely as aerial surveying often requires brief periods slightly outside of property boundaries

Q18

Are there any minor changes to the Rules that would make them easier for you to understand?

I don't know

Q19

What do you think of the proposed minor Rules changes?

Definitions and clarifications would be beneficial, particularly differentiating drones with onboard navigation vs. drones without additional safety features

Q20

Are there any other changes we should consider?

Definitions and clarifications would be beneficial, particularly differentiating drones with onboard navigation vs. drones without additional safety features. Further MoT approval for roadways should be relaxed

Page 5

Q21

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Yes,

Please comment:

As long as there is no cost involved to the pilot

Q22

What impact would a basic pilot qualification likely have on you?

If there is no cost, this would likely have no real impact on me as I understand the rules and regulations under part 101 as they currently stand

Q23

Electronic/online theory test

What format should this test take?

Q24

Yes, 16 years

Should there be a minimum age for basic pilot qualification?

Q25

I don't know

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27

Yes, with changes,

Should we introduce the proposed drone registration system?

Please comment:

Remove the requirement to place a unique number on the drone as this may impact resale value

Q28

What impact would drone registration likely have on you?

not much impact if identification was securely stored and did not require stickers or alterations to the drone

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Security is critical

Q30

Yes, with 250 grams as the weight threshold

Should there be a minimum weight threshold for registering a drone?

Enabling Drone Integration

Q31 **Yes, drones flown solely indoors,**
Should certain drones not need to be registered (select all that apply) **Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)**

Page 7

Q32 **No,**
Should we introduce remote ID? Please comment:
'certain drones' is too ambiguous and may not be within the capacity of hobbyists and may require technological integration from manufacturers and in certain locations this may not be practical

Q33
What impact would remote ID likely have on you?
I wouldn't know how to effectively implement it, particularly in areas of poor reception and if it may jeopardise the communication with the drone's camera systems

Page 8

Q34 **No,**
Should we consider introducing geo-awareness? Please comment:
This can be unweildly if required

Q35
What impact would geo-awareness likely have on you?
It would make it harder to operate the drone effectively for some applications

Page 9

Q36 **Respondent skipped this question**
Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Q37
If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

#45

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, May 19, 2021 6:29:51 PM
Last Modified: Wednesday, May 19, 2021 6:58:40 PM
Time Spent: 00:28:48
IP Address: [REDACTED]

Page 1

Q1 **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Paul

Q3

Email address

[REDACTED]

Q4

Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

I own and fly one. I believe there will be more and more as the tech becomes cheaper and better

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

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Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Pretty good ideas. The 101 rules are hard for a newbie to interpret. 101 and 102 have been written by a lawyer better coms needed

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

Yes, with changes ,

Please comment::

Im all for safe use of drones. Very wary of proposed id broadcast and who could get that. Overseas this has caused trouble.

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

Yes, with changes ,

Please comment:

Blanket measures diminish user acceptance and are often over the top

Q10

Are there any other problems and opportunities you can think of?

Good quality low level online education. Straight ahead lessons. Eg; this is how other people have got into bother dont do this. Also what to do if your out of your depth. It is very hard to find unbiased simple advice on skills and rules

Q11

Do you agree with the proposed order of implementation of the measures?

Yes

Page 4

Q12

Should drones have their own standalone Rule Part?

Yes,

Please comment:

Property rules need changing

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

Yes

Q14

Should we change the requirement to gain consent to fly above property?

Yes – remove the consent provision completely

Q15

Should we change the requirement to gain consent to fly above people?

Yes – use 'safe distances' as an alternative

Q16

30 metres

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Q17

Are there any other major Rules changes we should consider?

I feel rules need to be relaxed when flying below 60mtrs. You should not be a danger to other aircraft under 60mtrs and away from airports or flight path.

Q18

Are there any minor changes to the Rules that would make them easier for you to understand?

Yes,

Please comment:

Require landing upon visual of other aircraft. Unless permission from control has been given

Q19

What do you think of the proposed minor Rules changes?

Mostly good

Q20

Respondent skipped this question

Are there any other changes we should consider?

Page 5

Q21

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Yes,

Please comment:

Online free 101 licence

Q22

What impact would a basic pilot qualification likely have on you?

Just have to do it to fly

Q23

Electronic/online theory test

What format should this test take?

Q24

No

Should there be a minimum age for basic pilot qualification?

Q25

I don't know

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27

Yes,

Should we introduce the proposed drone registration system?

Please comment:

So long as its free. NO REGO FEE

Q28

What impact would drone registration likely have on you?

Surely be a pain in the ass

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Im suspect of the ability to keep data safe

Q30

Should there be a minimum weight threshold for registering a drone?

Yes, but with a different weight as the threshold ,

Please comment:

1000gms

Q31

Should certain drones not need to be registered (select all that apply)

Yes, drones flown solely indoors,

Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)

,

Please comment:

Im worried aboit over the top regulations constraing drone use

Page 7

Q32

No

Should we introduce remote ID?

Q33

What impact would remote ID likely have on you?

Sounds completely over the top

Page 8

Q34

Should we consider introducing geo-awareness?

No,

Please comment:

We just need a decent map

Q35

What impact would geo-awareness likely have on you?

Likely itll be wrong and the drone will be grounded because some clown went power crazy

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Please implement restrained changes. Carefully considered inexpensive and easily administered.

Q37

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

PROACTIVELY RELEASED BY
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#46

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, May 19, 2021 6:24:23 PM
Last Modified: Wednesday, May 19, 2021 7:10:40 PM
Time Spent: 00:46:16
IP Address: [REDACTED]

Page 1

Q1 Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Johan Kok

Q3

Email address

[REDACTED]

Q4 Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

I fly for fun and have a Youtube channel as well which I would love to use my drone for but due to current legislation effectively can't because of landowner permission requirments.

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

I agree with all of them if they make it easy for those who comply to fly within the rules especially if landowner permission requirements are removed. This has been the biggest barrier to flying within the rules as where I want to fly it is often hard to even identify the landowner and then there is the haphazard rules that vary from each council and region as well as agencies like DoC. It's near impossible to fly anywhere that is isn't a single identifiable property with a clear permission system or owner.

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

Yes,

Please comment::

If the rules updates make it easier for those who comply to fly then it will work. If it makes it harder like currently everyone will just ignore it like they do now and without enforcement nothing will change. The risk of modern drones, with basic training, geofencing and height and distance limitations would make it safe and easy to fly within the rules over any property. Size limitations like the overseas 250g rule is a good option too. Just make it easy for those who comply and don't separate commercial from recreational just base it on risk. Real risk not perceived risk.

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

Yes,

Please comment:

As per previous comment

Q10

Are there any other problems and opportunities you can think of?

The 250g rule like overseas may be useful or something like that to make it easy for low risk activities. Make any permission or additional requirements really simple. The current landowner permission requirements are crazy and impossible and the cost of part 102 prohibitive. An alternative would be to make the part 102 pilot certification cheaper and make it more useful without a full part 102 organization requirement. E.g. part 102 would include basic exemptions like flying over people and property without permission without needing a 102 organization which all becomes cost prohibitive for small operators e.g. youtube channels.

Q11

Do you agree with the proposed order of implementation of the measures?

Yes,

Please comment:

Just do it faster, the timeframes are really long with the pace of development it will be outdated before the first part is even implemented after 3 years.

Page 4

Q12

Should drones have their own standalone Rule Part?

Yes

Enabling Drone Integration

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

Yes,

Please comment:

It should need to be what is safe based on real risk not arbitrary distances. Geofencing can deal with this and drone manufacturers can be required to implement it.

Q14

Should we change the requirement to gain consent to fly above property?

Yes – remove the consent provision completely,

Please comment:

I mentioned alternative options in another comment e.g. 102 pilot cert with basic exemptions included.

Q15

Should we change the requirement to gain consent to fly above people?

Yes – use 'safe distances' as an alternative

Q16

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Other (please specify):

10m from people. 100m+ horizontally based on what is a general max VLS in good visibility. Probably around 200 to 300m

Q17

Are there any other major Rules changes we should consider?

More manufacturer responsibility. Height and distance limits and geofencing should be locked unless qualified.

Q18

Are there any minor changes to the Rules that would make them easier for you to understand?

Yes,

Please comment:

Make part 102 certification come with more benefit to the pilot without an 102 organization. At the moment it is pointless.

Q19

What do you think of the proposed minor Rules changes?

Respondent skipped this question

Q20

Are there any other changes we should consider?

Respondent skipped this question

Page 5

Q21

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Yes,

Please comment:

Everyone that wants to fly a drone should know the rules

Q22

What impact would a basic pilot qualification likely have on you?

None, I already have 102 and would happily do a basic or whatever is required if it makes it easier to fly for recreational and commercial reasons. Rules should be about safety and progress not fear.

Q23

What format should this test take?

Other (please specify):

There could be different levels with different benefits

Q24

Should there be a minimum age for basic pilot qualification?

Yes, other age (please specify):

Some drones really are toys and there should be a distinction of some sort and an age limit for real drones. Don't know what that should be.

Q25

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

I don't know

Q26

Is there any other special authorisations you would like to see?

As said previously more benefit should be given to 102 qualified pilots so they don't require an organization as well.

Page 6

Q27

Should we introduce the proposed drone registration system?

Yes,

Please comment:

As long as those who comply have benefits like the removal of property permissions.

Q28

What impact would drone registration likely have on you?

None, I fly within the rules.

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Respondent skipped this question

Q30

Should there be a minimum weight threshold for registering a drone?

Yes, but with a different weight as the threshold ,

Please comment:

Based on real risk not perceived arbitrary numbers. For example it may be based on the manufacturers geofencing and safety features etc.

Q31

Should certain drones not need to be registered (select all that apply)

Yes, drones flown solely indoors,

Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)

,

Yes, others (please specify below),

Please comment:

Based on risk

Page 7

Q32

Should we introduce remote ID?

Yes,

Please comment:

It will help with enforcement and also safety. Again this needs to come with benefits to the pilots who comply

Q33

What impact would remote ID likely have on you?

I may have to upgrade my drone

Page 8

Q34

Should we consider introducing geo-awareness?

Yes,

Please comment:

Can't wait for this but it would be impossible without removing the property permission requirements. Current airspace rules aren't that hard to follow it's the permission that is always the problem. Saying that having one accurate place for everything would be phenomenal.

Q35

What impact would geo-awareness likely have on you?

It would make it much easier and safer to fly for everyone.

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Keep it simple. Make it easy for those who comply to fly and based whatever rules are made on real risks and safety concerns not public perception.

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

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#47

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, May 19, 2021 10:39:29 PM
Last Modified: Wednesday, May 19, 2021 11:18:00 PM
Time Spent: 00:38:30
IP Address: [REDACTED]

Page 1

Q1 Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Garth Haylock

Q3

Email address

[REDACTED]

Q4 Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

Recreational flying for photos and videos

Integrated use for search and rescue

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Well intentioned, likely to be expensive to establish and implement, and costs being moved onto operators is likely to remain a barrier and continue to be a compliance issue, especially in the lower cost bracket of drones.

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

Yes, with changes ,

Please comment::

Consider different levels of restriction for urban and rural areas, public area flights vs flying over private land, such as farmers, vineyards etc

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

Respondent skipped this question

Q10

Are there any other problems and opportunities you can think of?

Selfie drones, which are operated by hand gesture, and drones operating on an automated "follow me" flight.
Also the integration of the fishing drone systems with payload drops, potentially less restricted if height is further limited (they dont need much altitude)
A flexible, agile set of guidelines is required

Q11

Do you agree with the proposed order of implementation of the measures?

Yes,

Please comment:

In general yes, but it must not be more than a few dollars for any registration fee or intro course that is required.

Page 4

Q12

Should drones have their own standalone Rule Part?

Yes

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

Yes,

Please comment:

Especially in the case of single runway, or suitable geographical barriers. Also clarify the distance from float plane operating areas such as Picton, Taupo and Auckland

Q14

Should we change the requirement to gain consent to fly above property?

Yes – remove the consent provision completely

Q15

Should we change the requirement to gain consent to fly above people?

Yes – use 'safe distances' as an alternative,

Please comment:

Just those in the immediate area, basically you should be able to talk to them as you fly

Q16

10 metres

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Q17

Respondent skipped this question

Are there any other major Rules changes we should consider?

Q18

Respondent skipped this question

Are there any minor changes to the Rules that would make them easier for you to understand?

Q19

Respondent skipped this question

What do you think of the proposed minor Rules changes?

Q20

Are there any other changes we should consider?

Control zone - while technically it extends to the ground, there could be a provision for flight to maybe 20m, line of sight allowed without the current restrictions on shielded ops

Page 5

Q21

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Yes, with changes ,

Please comment:

Consider the current free education program and test available from dronetrust - this clearly outlined the 101 requirements

Q22

What impact would a basic pilot qualification likely have on you?

It would have to be low cost and availability online

Q23

Electronic/online theory test

What format should this test take?

Q24

Yes, 16 years

Should there be a minimum age for basic pilot qualification?

Q25

Yes

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Is there any other special authorisations you would like to see?

Night flight extension - either training or minimum standard for strobe lights

Page 6

Q27

Should we introduce the proposed drone registration system?

No,

Please comment:

This is likely to be very difficult to enforce, maintaining the register when sold privately. Most drones already have a unique serial number and are linked to the operator in some way

Q28

What impact would drone registration likely have on you?

Currently nil as under 250g

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Consider mandatory phone number on the drone as an alternative

Q30

Yes, with 250 grams as the weight threshold

Should there be a minimum weight threshold for registering a drone?

Enabling Drone Integration

Q31

Should certain drones not need to be registered (select all that apply)

Yes, drones flown solely indoors,

Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)

,

Yes, others (please specify below),

Please comment:

Overseas operators only in the country for a short period of time

Page 7

Q32

Should we introduce remote ID?

Yes

Q33

What impact would remote ID likely have on you?

It should only be required on large drones flying at large distance and in potentially busy airspace. Would not be possible for me

Page 8

Q34

Should we consider introducing geo-awareness?

Yes

Q35

What impact would geo-awareness likely have on you?

Simplicity of finding and interpretation of safe to fly areas

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Any changes need to remain in touch with the technology changes and trends, and allow the onboard systems, GPS, avoidance sensors etc to be used and trusted to reduce current limitations

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

#48

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, May 20, 2021 9:56:25 AM
Last Modified: Thursday, May 20, 2021 10:35:27 AM
Time Spent: 00:39:02
IP Address: [REDACTED]

Page 1

Q1 Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Keerthy Chakradhar

Q3

Email address

[REDACTED]

Q4 Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

I'm mainly into photography and videography.

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

Q7 Respondent skipped this question

What is your view on the proposed series of measures?
Are there any other alternatives you suggest we consider?

Q8 Yes, with changes

Do you think the proposed series of measures would help achieve the desired objectives?

Q9 Yes, with changes

Do you think the proposed series of measures would address the problems and opportunities identified?

Q10
Are there any other problems and opportunities you can think of?

A free course by CAA for basic part 101 would be great. This would encourage people to attend and also ask questions before assuming things which can cause major mishaps.

Q11 Yes

Do you agree with the proposed order of implementation of the measures?

Page 4

Q12 I don't know,
Please comment:
Probably a good idea.

Should drones have their own standalone Rule Part?

Q13 Yes,
Please comment:
As long as the user has passed the 101 certification and logs the flight on Airshare, this can change. All users within 4km still have to ring ATR before flying.

Should we review the four-kilometre minimum flight distance from aerodromes?

Q14 Yes – relax the consent provision in another way,
Please comment:
If the footage is not used for illegal activities, this can be relaxed. Not sure how to monitor this.

Should we change the requirement to gain consent to fly above property?

Q15 Yes – remove the requirement completely,
Please comment:
You can go and get every single person in the beach to sign it off for you. This should be relaxed as long as the user operates within part 101 regulations.

Should we change the requirement to gain consent to fly above people?

Q16

10 metres

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Q17

Respondent skipped this question

Are there any other major Rules changes we should consider?

Q18

Yes,

Are there any minor changes to the Rules that would make them easier for you to understand?

Please comment:

More clarity on shielded operations would be required. I've seen a lot of people confused on this side of things.

Q19

Respondent skipped this question

What do you think of the proposed minor Rules changes?

Q20

Respondent skipped this question

Are there any other changes we should consider?

Page 5

Q21

Yes, with changes ,

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Please comment:

With free online courses just like NZTA driver's license would be great. This would kick out most of the dodgy users.

Q22

What impact would a basic pilot qualification likely have on you?

We'll be much more confident to fly in public places as the people would be aware that we are qualified to fly and won't misuse their privacy.

Q23

Electronic/online theory test

What format should this test take?

Q24

Yes, 14 years

Should there be a minimum age for basic pilot qualification?

Q25

Respondent skipped this question

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27

I don't know

Should we introduce the proposed drone registration system?

Q28

Respondent skipped this question

What impact would drone registration likely have on you?

Q29

Respondent skipped this question

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Q30

Yes, but with a different weight as the threshold ,
Please comment:
500grams

Should there be a minimum weight threshold for registering a drone?

Q31

Respondent skipped this question

Should certain drones not need to be registered (select all that apply)

Page 7

Q32

Respondent skipped this question

Should we introduce remote ID?

Q33

Respondent skipped this question

What impact would remote ID likely have on you?

Page 8

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Q34

Respondent skipped this question

Should we consider introducing geo-awareness?

Q35

Respondent skipped this question

What impact would geo-awareness likely have on you?

Page 9

Q36

Respondent skipped this question

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

PROACTIVELY RELEASED BY
THE MINISTRY OF TRANSPORT

#49

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, May 19, 2021 9:25:11 AM
Last Modified: Thursday, May 20, 2021 10:38:12 AM
Time Spent: Over a day
IP Address: [REDACTED]

Page 1

Q1 Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

David Ross

Q3

Email address

[REDACTED]

Q4

Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

I fly remote controlled planes for pleasure

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

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Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Yes, these all seem sensible steps. Has any consideration been given to a distinction between multi-rotor RPAS and fixed wing, camera-less aircraft such as flown by hobbyists? They are used in very different ways in different locations. Multi rotor craft are able to be flown in any location, however fixed wing craft are generally only flown in open areas such as parks or rural areas.

Q8

Yes

Do you think the proposed series of measures would help achieve the desired objectives?

Q9

Yes

Do you think the proposed series of measures would address the problems and opportunities identified?

Q10

Respondent skipped this question

Are there any other problems and opportunities you can think of?

Q11

Yes

Do you agree with the proposed order of implementation of the measures?

Page 4

Q12

Yes

Should drones have their own standalone Rule Part?

Q13

Yes

Should we review the four-kilometre minimum flight distance from aerodromes?

Q14

Yes – use 'safe distances' as an alternative

Should we change the requirement to gain consent to fly above property?

Q15

Yes – use 'safe distances' as an alternative

Should we change the requirement to gain consent to fly above people?

Q16

30 metres

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Q17

Respondent skipped this question

Are there any other major Rules changes we should consider?

Q18

I don't know

Are there any minor changes to the Rules that would make them easier for you to understand?

Q19

Respondent skipped this question

What do you think of the proposed minor Rules changes?

Q20

Respondent skipped this question

Are there any other changes we should consider?

Page 5

Q21

Yes

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Q22

What impact would a basic pilot qualification likely have on you?

Little to none

Q23

Electronic/online theory test

What format should this test take?

Q24

Yes, 14 years

Should there be a minimum age for basic pilot qualification?

Q25

I don't know

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27

Should we introduce the proposed drone registration system?

Yes, with changes,

Please comment:

I believe there should be a higher weight limit for non-camera, fixed wing craft. Around 1KG seems right.

Q28

What impact would drone registration likely have on you?

I would need to register my motor glider

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Sounds good

Q30

Should there be a minimum weight threshold for registering a drone?

Yes, but with a different weight as the threshold ,

Please comment:

As above, fixed wing craft should have higher threshold. These craft are much less dense and are generally constructed from foam. The impact from a 1KG foam plane vs a 1KG multirotor is significantly different.

Q31

Should certain drones not need to be registered (select all that apply)

Yes, drones flown solely indoors

Page 7

Q32

Should we introduce remote ID?

Yes,

Please comment:

Good for larger craft, but inappropriate for smaller hobby type craft.

Q33

What impact would remote ID likely have on you?

Unsure, as I only fly small fixed wing craft.

Page 8

Q34

Yes

Should we consider introducing geo-awareness?

Q35

What impact would geo-awareness likely have on you?

Useful to easily identify where I can or can't fly

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Overall I'm supportive of the changes. I just hope that sufficient consideration is given to the functional and risk profile differences of small fixed wing vs multi-rotors.

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

PROACTIVELY RELEASED BY
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#50

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, May 20, 2021 10:53:49 AM
Last Modified: Thursday, May 20, 2021 11:08:58 AM
Time Spent: 00:15:09
IP Address: [REDACTED]

Page 1

Q1 Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Ralph Soriano

Q3

Email address

[REDACTED]

Q4 Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

Hobby/ drone photography.

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

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Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

I agree on all the above mentioned measures.

Q8

Yes, with changes

Do you think the proposed series of measures would help achieve the desired objectives?

Q9

Yes

Do you think the proposed series of measures would address the problems and opportunities identified?

Q10

Are there any other problems and opportunities you can think of?

N/A

Q11

Yes

Do you agree with the proposed order of implementation of the measures?

Page 4

Q12

I don't know

Should drones have their own standalone Rule Part?

Q13

No

Should we review the four-kilometre minimum flight distance from aerodromes?

Q14

No – keep the existing consent provision

Should we change the requirement to gain consent to fly above property?

Q15

Yes – use 'safe distances' as an alternative

Should we change the requirement to gain consent to fly above people?

Q16

50 meters

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

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Q17

Respondent skipped this question

Are there any other major Rules changes we should consider?

Q18

No

Are there any minor changes to the Rules that would make them easier for you to understand?

Q19

Respondent skipped this question

What do you think of the proposed minor Rules changes?

Q20

Respondent skipped this question

Are there any other changes we should consider?

Page 5

Q21

I don't know

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Q22

Respondent skipped this question

What impact would a basic pilot qualification likely have on you?

Q23

A practical examination of skill and a paper based written theory test (at a provider)

What format should this test take?

Q24

Yes, 16 years

Should there be a minimum age for basic pilot qualification?

Q25

I don't know

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27

Yes

Should we introduce the proposed drone registration system?

Q28

Respondent skipped this question

What impact would drone registration likely have on you?

Q29

Respondent skipped this question

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Q30

Yes, with 250 grams as the weight threshold

Should there be a minimum weight threshold for registering a drone?

Q31

Yes, drones flown solely indoors

Should certain drones not need to be registered (select all that apply)

Page 7

Q32

Yes,

Should we introduce remote ID?

Please comment:

How? May not be safe with drones with wifi connection to the controller as it might interfere with transmission signal. Registering and monitoring every flight with AirShare can help too.

Q33

Respondent skipped this question

What impact would remote ID likely have on you?

Page 8

Q34

Yes

Should we consider introducing geo-awareness?

Q35

What impact would geo-awareness likely have on you?

I would be aware on the places where it is safe to operate a drone and when it's not safe.

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

None.

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

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#51

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Started: Thursday, May 20, 2021 1:18:24 PM
Last Modified: Thursday, May 20, 2021 1:43:34 PM
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IP Address: [REDACTED]

Page 1

Q1 **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Tom Revell

Q3

Email address

[REDACTED]

Q4

Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

Fly drones for business for aerial imagery, survey and monitoring. Personnel use for leisure activities too.

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

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Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

The series of measures seem reasonable and easy to implement in a phasing in approach.

Q8

Yes

Do you think the proposed series of measures would help achieve the desired objectives?

Q9

Yes

Do you think the proposed series of measures would address the problems and opportunities identified?

Q10

Are there any other problems and opportunities you can think of?

25kg seems quite large for a non-practical test. Using commercially available drones as a guide, such as the Phantom 4 and similar might be a better weight limit to set - anything bigger should need to have some level of practical test to ensure competence.

Q11

Do you agree with the proposed order of implementation of the measures?

Yes,

Please comment:

Updating the Rules should be paramount. Also it would be worth looking into the requirements to fly over DoC land. The permission process and more importantly the ~\$60 fee to fly each region is hugely restrictive. Need to find ways to maintain and conserve these areas without limiting drone use too widely. A no-fly zone or restricted use around huts, area of interest etc. where people will be seems a better approach than a blanket permission approach.

Page 4

Q12

Should drones have their own standalone Rule Part?

Yes,

Please comment:

Very different to other aircraft in Part 101.

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

Yes,

Please comment:

Especially considering the topographic features around some aerodromes. Although shielded operations they still create confusions around ability to fly, especially mapping flights.

Q14

Should we change the requirement to gain consent to fly above property?

Yes – use 'safe distances' as an alternative,

Please comment:

Minimum distances from 'structures' may be more applicable - how would this then work with publicly owned property -it would essentially remove the DoC and Council approaches in place at the moment - which is good for general use. But may need to be revised depending on feedback - could trial in a city like Christchurch which has a good map of council approved public land for flying.

Q15

Should we change the requirement to gain consent to fly above people?

Yes – use 'safe distances' as an alternative,

Please comment:

Although 'safe distance' may be too subjective to the pilot vs. person being flown above. Maybe could request a minimum height to flyover people. Not sure how you manage people hovering over people or property without consent - although this behavior can happen without drones.

Q16

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

30 metres

Q17

Are there any other major Rules changes we should consider?

Remove the need for Part 104a to fly within an aerodrome, should be acceptable to fly within aerodrome if approval obtained by aerodrome operator.

Q18

Are there any minor changes to the Rules that would make them easier for you to understand?

Yes,

Please comment:

Shielded operation - although well done with the videos available, I still see confusion of how this rule is applied.

Q19

What do you think of the proposed minor Rules changes?

Ok

Q20

Are there any other changes we should consider?

NA

Enabling Drone Integration

Q21

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Yes,

Please comment:

25kg is way too heavy for an online only test. An online test is a good idea, and should cover most pilots flying readily available drones (~1.5kg, Phantom size?).

Anything greater than these commercial drones should have a practical test applied.

Q22

What impact would a basic pilot qualification likely have on you?

It would be good, having a simple online test would be great, would be happy to see pre-reading as well as a bit more of a comprehensive test that the current 'quiz' online at the moment. It would also provide confidence in the business space knowing of competent people etc.

There also needs to be something in between Part 101 operating and the Part104a practical test which is advanced. A practical test Part 101+ would be good, testing simple operation in GPS mode to ensure pilot understands rule, this could be used to then approve aerodrome flight. Part104a is too hard for the purpose it serves and restricts too many people from operating in situations they would be fine doing so in.

Q23

What format should this test take?

Other (please specify):

Online for Part 101, Online and Practical (provider) for a one day Part101+, and Multiday practical and paper (as for current Part 104a)

Q24

Should there be a minimum age for basic pilot qualification?

Yes, 14 years

Q25

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Yes

Q26

Is there any other special authorisations you would like to see?

Respondent skipped this question

Page 6

Q27

Should we introduce the proposed drone registration system?

Yes

Q28

What impact would drone registration likely have on you?

I would register - try to not to implement cost for business use like Australia as this restricts innovation.

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Good idea

Q30

Yes, with 250 grams as the weight threshold

Should there be a minimum weight threshold for registering a drone?

Q31

Yes, drones flown solely indoors.

Should certain drones not need to be registered (select all that apply)

Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)

Please comment:

Anything flown by a smartphone, although most of these are under 250g

Page 7

Q32

Yes

Should we introduce remote ID?

Q33

What impact would remote ID likely have on you?

I would rely on the drone being pre-equipped with this feature and so may need to be pushed through the manufacturers.

Page 8

Q34

Should we consider introducing geo-awareness?

Yes,

Please comment:

But need to be mindful of how this could be "enabled" if needed. For example if an aerodrome is geofenced, but need to do work at the airport (aerial inspection of runway) then how would this be done. Have had issues of automated mapping jobs continually re-setting when flying across a geo-fenced boundary.

Q35

What impact would geo-awareness likely have on you?

It could be tricky when flying across the boundary as above.

Page 9

Q36

Respondent skipped this question

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

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#52

COMPLETE

Collector: Web Link 1 (Web Link)
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Last Modified: Thursday, May 20, 2021 3:20:39 PM
Time Spent: 00:18:58
IP Address: [REDACTED]

Page 1

Q1 **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Jiorde White

Q3

Email address

[REDACTED]

Q4

Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

Commercial Helicopter Pilot and believe drone use should be controlled especially in busy airspace that includes non control zones.

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

I believe drone use should be used but controlled in a way back to the manufacturer to begin with. Not allowing the drone operator to reach an altitude which will cause an incident with an aircraft which may cost someone their life.

Q8

No

Do you think the proposed series of measures would help achieve the desired objectives?

Q9

I don't know

Do you think the proposed series of measures would address the problems and opportunities identified?

Q10

Are there any other problems and opportunities you can think of?

It should be more difficult to allow the use of drones by the general public.

Q11

No

Do you agree with the proposed order of implementation of the measures?

Page 4

Q12

I don't know

Should drones have their own standalone Rule Part?

Q13

No

Should we review the four-kilometre minimum flight distance from aerodromes?

Q14

No – keep the existing consent provision

Should we change the requirement to gain consent to fly above property?

Q15

No – keep the existing requirement

Should we change the requirement to gain consent to fly above people?

Q16

50 meters

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Q17

Respondent skipped this question

Are there any other major Rules changes we should consider?

Q18

No

Are there any minor changes to the Rules that would make them easier for you to understand?

Q19

Respondent skipped this question

What do you think of the proposed minor Rules changes?

Q20

Respondent skipped this question

Are there any other changes we should consider?

Page 5

Q21

No,

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Please comment:

"The test would be simple" is an exact reason why an increase in drone use would be detrimental on the safety in the aviation sector.

Q22

What impact would a basic pilot qualification likely have on you?

Giving more people a simple qualification would be not be beneficial as it would give people a false sense of knowledge. If it was too simple for them to complete then what is the point of even having a rule change!

Q23

Other (please specify):

What format should this test take?

Comprehensive test including the risks drones have on lives when operating.

Q24

Yes, 16 years

Should there be a minimum age for basic pilot qualification?

Q25

No

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Is there any other special authorisations you would like to see?

Public Arrest on anyone who is seen to be operating in an unsafe manner.

Page 6

Q27

Yes

Should we introduce the proposed drone registration system?

Q28

What impact would drone registration likely have on you?

none

Q29

Respondent skipped this question

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Q30

Yes, but with a different weight as the threshold ,

Should there be a minimum weight threshold for registering a drone?

Please comment:

All drones should need to be registered

Q31

No

Should certain drones not need to be registered (select all that apply)

Page 7

Q32

Yes

Should we introduce remote ID?

Q33

What impact would remote ID likely have on you?

none

Page 8

Q34

Yes

Should we consider introducing geo-awareness?

Q35

What impact would geo-awareness likely have on you?

The more restrictions on drones the safer aircraft are

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Drone use needs more control.

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

PROACTIVELY RELEASED BY
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#53

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, May 20, 2021 3:57:31 PM
Last Modified: Thursday, May 20, 2021 4:20:01 PM
Time Spent: 00:22:29
IP Address: [REDACTED]

Page 1

Q1 **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Anna Kominik

Q3

Email address

[REDACTED]

Q4

Who are you submitting on behalf of?

Other,

If you are not submitting as an individual, please specify who you represent.:

Wisk New Zealand

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THE MINISTRY OF TRANSPORT

Q5

Briefly tell us your interest in drones

Wisk New Zealand is a joint-venture company that is currently testing, certifying and going-to-market in New Zealand with one of the world's first self-flying, electric vertical takeoff and landing aircraft. The company is one of the Government's flagship programmes under the Ministry of Business Innovation and Employment's Innovative Partnerships Programme.

Our interest in the exposure draft and in submitting is around future-proofing the New Zealand aviation ecosystem so that it can take full advantage of the evolving AAM industry.

The air taxi market is anticipated to be worth US\$1tn a year by 2040, with passenger traffic comprising US\$851bn of that. We believe that New Zealand has an amazing window of opportunity to lead the world in the new aerospace evolution. With technology advances in air cargo drones, emergency drones, commercial drones, air taxis and even in general aviation aircraft, society is going to need to think about how we safely and efficiently integrate the different airspace users. New Zealand is not alone in experiencing an increase in the numbers of a variety of aircraft, weather balloons and drones. All of which need to move around safely. The benefits of developing that airspace in an integrated, future-proofed way are becoming more evident as new craft like Wisk emerge.

Electric aircraft also mark an important evolution in how we move about. Aviation contributes to about 14% of Aotearoa New Zealand's carbon footprint. We all prefer to connect face-to-face. That is why flight is so important to how we connect with each other. But we also know that we can't continue to use the planet's resources in the way that we have. Wisk's aircraft are developed with the planet in mind and are part of the electric revolution towards clean, green transportation. We are also committed to supporting the New Zealand Government's vision of New Zealand being Carbon Free by 2050.

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

■■■

Page 3

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

We believe that, while this discussion document does address some current issues in aviation, it does not provide us with confidence that the future-focused issues and thinking have been adequately considered.

In short, it does not fulfill the mission of creating a regulatory framework for drone integration that will support New Zealand to retain its strong global credibility and leading edge thinking.

We outline some proposed issues and changes under the specific sections later in our submission.

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

Yes, with changes ,

Please comment::

We are supportive of the need for Drone Integration to be addressed. However, we join with other submitters in our overall concern that the proposals are being done in isolation of the National Aerospace Strategy and have not gone far enough to truly advance airspace integration in a way that will support the potential growth of the industry and allow Aotearoa New Zealand to truly reap its benefits. In our view, the discussion document doesn't adequately accelerate the process or support the change management required to ensure that New Zealand airspace continues to be well managed, safe and supports growth in the aero and space sectors. In particular we are concerned about the perceived : - Reduced urgency and a lost opportunity for progress - Number of international organisations leaving the NZ aviation ecosystem because of tardiness in this area, with the flow on negative impact on the social and economic benefits available through growth in this industry.

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

Yes, with changes

Q10

Are there any other problems and opportunities you can think of?

We are concerned that some of the definitions are being future-proofed enough (taking even a 15 year view). A key example of this is the use of the term "drone". Drone is an unsuitable word to cover all aircraft where the pilot is removed from the air vehicle. In our opinion, as an example, it conjures the wrong impression when using 'drone' to describe passenger-carrying aircraft.

We would encourage the use of Remote Piloted Aircraft System (RPAS) or for the Ministry of Transport to take a leaderful view of the terminology. Currently, Internationally, the industry is increasingly using advanced air mobility to describe the entire cohort of new aviation technologies being developed with urban air mobility.

Q11

Do you agree with the proposed order of implementation of the measures?

Yes

Q12

Should drones have their own standalone Rule Part?

Yes,

Please comment:

We agree with the proposal to leave Part 102 alone. From a UAS perspective, the NZ aviation regulatory framework is globally unique, primarily due to the Rule Part 102. It is a true enabler for the NZ aviation industry and its future growth and should be maintained. We recognise there are challenges associated with Rule Part 101 in both the interpretation and application of the rules. This is reflected in paragraphs 93 - 95, and, we believe, clarifying these rules, would benefit both the applicant and Regulator.

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

No ,

Please comment:

This is a blanket rule

Q14

Should we change the requirement to gain consent to fly above property?

Yes – use 'safe distances' as an alternative

Q15

Should we change the requirement to gain consent to fly above people?

Yes – use 'safe distances' as an alternative

Q16

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

30 metres

Q17

Are there any other major Rules changes we should consider?

We agree with the proposal to leave Part 102 alone. From a UAS perspective, the NZ aviation regulatory framework is globally unique, primarily due to the Rule Part 102. It is a true enabler for the NZ aviation industry and its future growth and should be maintained.

We recognise there are challenges associated with Rule Part 101 in both the interpretation and application of the rules. This is reflected in paragraphs 93 - 95, and, we believe, clarifying these rules, would benefit both the applicant and Regulator.

Q18

Are there any minor changes to the Rules that would make them easier for you to understand?

Yes

Q19

What do you think of the proposed minor Rules changes?

We do not agree with the proposed creation of a new Rule Part. A new Rule Part for all 'Drones' in NZ risks diverging from the global standards, which are being assessed across the globe.

Our view is therefore that the proposed changes risk the effectiveness of the NZ aviation system for the following reasons:

- There is no distinction between 'recreational' and 'commercial' UAS as referenced in paragraph 7, although this doesn't really address the main challenge.
- There is no distinction regarding the type of UAS or UAS operation - this is crucial.
- The size of UAS, payload type, operational area, flight rules being operated under, levels of autonomy, design assurance level of the UAS are widely different for different UAS.

UAS Operations would be vastly different for real estate agents using a small UAS for home videography when compared with an autonomous air taxi transporting people across a city.

- The all encompassing use of the term 'Drone' exacerbates this issue.

Q20

Are there any other changes we should consider?

To solve the challenges outlined in the discussion document, we would propose the following:

Part 101 - Update

- Revise the language and intent as described in paragraphs 93 - 95 to make the Rule Part clear and easy to understand.
- A performance-based approach can be applied to the revision of Part 101, whilst clearly identifying prescriptive pathways to enable the majority of Part 101 applicants.
- This approach would streamline the application process for both the applicant and the CAA.

Part 102 - No change

- As described, Part 102 is an NZ point of difference and should be maintained to advance the industry.

Existing Operational Rules (e.g. Part 91, Part 135 etc.)

- Evaluate the existing operational rules framework and identify how UAS operations and the associated requirements can be included into the existing aviation system e.g. by including a dedicated subpart in the appropriate Rule Part such as Part 91, Part 135 etc.
- This approach would ensure the operational aspects associated to UAS Operations are integrated into the existing framework minimising the impact to and streamlining the overall system.

Q21

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Yes,

Please comment:

We believe that we should be introducing a framework of requirements based on agreed core principles of ensuring the safety and good management of New Zealand's airspace. In practice, this framework would include basic requirements for the simplest of aircraft (hand held drones/ model aircraft) to increasingly complex requirements for the most complex of aircraft/ operations (such as passenger carrying UAM or commercial aircraft). This basic pilot qualification would fit within that continuum.

Q22

What impact would a basic pilot qualification likely have on you?

It would make our operations and our passengers safer.

Q23

What format should this test take?

Electronic/online theory test

Q24

Should there be a minimum age for basic pilot qualification?

Yes, 16 years

Q25

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Yes

Q26

Is there any other special authorisations you would like to see?

Respondent skipped this question

Page 6

Q27

Should we introduce the proposed drone registration system?

Yes

Q28

What impact would drone registration likely have on you?

Remote ID will contribute to safer airspace for everyone and is a recognition that the future of airspace in Aotearoa New Zealand will become increasingly complex. These measures help support the safe entry of new technology into airspace and secure the social and economic benefits that can ensue from the growth of the Advanced Air Mobility industry in this country.

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Agree with it, although can see there should be some parameters for the requirements.

Q30

Should there be a minimum weight threshold for registering a drone?

Yes, with 250 grams as the weight threshold,

Please comment:

Could implement in accordance with the ASTM standard, but leave the door open to other future standards

Q31

Should certain drones not need to be registered (select all that apply)

Yes, drones flown solely indoors

Page 7

Q32

Should we introduce remote ID?

Yes

Q33

What impact would remote ID likely have on you?

Remote ID will contribute to safer airspace for everyone and is a recognition that the future of airspace in Aotearoa New Zealand will become increasingly complex. These measures support the safe entry of new technology into airspace and secure the social and economic benefits that can ensue from the growth of the Advanced Air Mobility industry in this country.

Page 8

Q34

Should we consider introducing geo-awareness?

Yes,

Please comment:

We believe that geo-awareness coupled with Remote ID, presents one of the largest benefits to the NZ airspace system, specifically in relation to altitude awareness both to the UAS Operator and other airspace users. Geo-awareness could also be interpreted as a nationwide Common Operating Picture (COP). The 'COP' is a key building block for an Unmanned Service Supplier (USS) or Provider of Services for Urban Air Mobility (PSU), both of which are concepts being advanced globally to support the future of aviation. NZ has the foundations of this already through Airways (through its systems and subsidiaries) and could be advanced rapidly. Paragraph 223 highlights the benefit of alerting an operator if their UAS is entering a prohibited zone.

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Q35

What impact would geo-awareness likely have on you?

This topic presents a real opportunity for NZ to have a single truth source for aircraft location which would service the whole NZ airspace community. Such a system would:

- substantially advance the situational awareness for all airspace users,
 - enhance the safety level of NZ airspace.
 - enable advanced UA operations and their integration to the airspace system.
-

Page 9

Q36

Respondent skipped this question

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

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#54

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, May 20, 2021 5:00:25 PM
Last Modified: Thursday, May 20, 2021 5:13:54 PM
Time Spent: 00:13:28
IP Address: [REDACTED]

Page 1

Q1 Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Kenneth Ryder

Q3

Email address

[REDACTED]

Q4 Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

I fly small photographic drones

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

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Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

I believe that Pilot registration will be hard to achieve and should only be enforced above a certain weight and to fly in certain areas. So restriction on beaches, tourist spots etc unless you have a license to fly

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

No,

Please comment::

Who will enforce and what powers? Police are already under resourced.

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

Yes

Q10

Are there any other problems and opportunities you can think of?

Respondent skipped this question

Q11

Do you agree with the proposed order of implementation of the measures?

Yes

Page 4

Q12

Should drones have their own standalone Rule Part?

Yes

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

Yes,

Please comment:

Foy certified Pilots only

Q14

Should we change the requirement to gain consent to fly above property?

Yes – use 'safe distances' as an alternative

Q15

Should we change the requirement to gain consent to fly above people?

Yes – use 'safe distances' as an alternative,

Please comment:

There is no way to obtain consent over beaches, rivers, tourist spots in any case.

Q16

30 metres

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Q17

Respondent skipped this question

Are there any other major Rules changes we should consider?

Q18

No

Are there any minor changes to the Rules that would make them easier for you to understand?

Q19

What do you think of the proposed minor Rules changes?

Should make things clearer and fairer

Q20

Respondent skipped this question

Are there any other changes we should consider?

Page 5

Q21

Yes

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Q22

What impact would a basic pilot qualification likely have on you?

Nothing other than to fly where I want to I would need a license.

Q23

Other (please specify):

What format should this test take?

Combination, online theory 1st, practical at provider 2nd.

Q24

Yes, 14 years

Should there be a minimum age for basic pilot qualification?

Q25

Yes

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27

Should we introduce the proposed drone registration system?

Yes, with changes,

Please comment:

Only over a certain weight, or certain spec - max height or max distance

Q28

What impact would drone registration likely have on you?

Nil, happy to register

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Fine

Q30

Should there be a minimum weight threshold for registering a drone?

Yes, but with a different weight as the threshold ,

Please comment:

1kg

Q31

Should certain drones not need to be registered (select all that apply)

Yes, drones flown solely indoors,

Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)

Page 7

Q32

Should we introduce remote ID?

No

Q33

What impact would remote ID likely have on you?

Nil

Page 8

Q34

Yes

Should we consider introducing geo-awareness?

Q35

What impact would geo-awareness likely have on you?

Be easier to see restricted areas better than the current app used

Page 9

Q36

Respondent skipped this question

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

PROACTIVELY RELEASED BY
THE MINISTRY OF TRANSPORT

#55

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, May 20, 2021 5:23:27 PM
Last Modified: Thursday, May 20, 2021 5:56:58 PM
Time Spent: 00:33:30
IP Address: [REDACTED]

Page 1

Q1 Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Les

Q3

Email address

[REDACTED]

Q4

Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

Primarily because I fly GA aircraft

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

The measures proposed are reasonable as far as regulating Drone operations are concerned, but there is very little coverage of the relationship to GA aircraft being operated outside of controlled airspace.

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

Yes, with changes ,

Please comment::

The issue of visibility to GA aircraft, particularly gliders, which often already carry significant other instrumentation, is not resolved by these proposals. It is difficult enough to see full size aircraft in time to take avoidance action. Even a 25kg drone will be much smaller.

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

Yes

Q10

Are there any other problems and opportunities you can think of?

As already stated above.

Q11

Do you agree with the proposed order of implementation of the measures?

Yes

Page 4

Q12

Should drones have their own standalone Rule Part?

Yes,

Please comment:

GA pilots need to know what the rules are that apply to drones so do need to be advised of changes.

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

Yes,

Please comment:

Provided there is adequate separation from GA traffic there could be an easing of the current limit.

Q14

Should we change the requirement to gain consent to fly above property?

No – keep the existing consent provision,

Please comment:

The high resolution available with present day cameras makes it too easy to breach an individuals privacy. I believe that the current requirement should remain.

Q15

Should we change the requirement to gain consent to fly above people?

Yes – relax the requirement in another way,

Please comment:

I have been at an event where a reasonably large drone was flown above a crowd and felt most uncomfortable. A drone doesn't have any gliding ability to avoid a vertical descent in the event of a failure and as software is relied on for operation no one can guarantee that a software bug wont show up at a critical time, or whether someone could maliciously hack into the control system being used with the intention of causing harm.

Q16

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Respondent skipped this question

Q17

Are there any other major Rules changes we should consider?

Not that I can see at present.

Q18

Are there any minor changes to the Rules that would make them easier for you to understand?

No

Q19

What do you think of the proposed minor Rules changes?

No additional comment.

Q20

Are there any other changes we should consider?

Comprehensively cover the need to avoid conflict with GA aircraft outside of controlled airspace.

Page 5

Q21

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Yes

Q22

What impact would a basic pilot qualification likely have on you?

Respondent skipped this question

Enabling Drone Integration

Q23 What format should this test take?	Other (please specify): While the theory can be covered by an on-line test, an evaluation of skills can really only be done in a direct contact environment.
Q24 Should there be a minimum age for basic pilot qualification?	Yes, 14 years
Q25 Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?	Yes
Q26 Is there any other special authorisations you would like to see?	Respondent skipped this question
Page 6	
Q27 Should we introduce the proposed drone registration system?	Yes
Q28 What impact would drone registration likely have on you?	Respondent skipped this question
Q29 What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?	Respondent skipped this question
Q30 Should there be a minimum weight threshold for registering a drone?	Yes, with 250 grams as the weight threshold
Q31 Should certain drones not need to be registered (select all that apply)	Yes, drones flown solely indoors, Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites) , Please comment: Outdoor flying at model sites needs to be under the control of a suitable person if the site is on or near an airfield.

Page 7

Q32

Yes

Should we introduce remote ID?

Q33

What impact would remote ID likely have on you?

Only useful to GA pilots for collision avoidance if it integrates with existing systems available in the aircraft.

Page 8

Q34

Yes

Should we consider introducing geo-awareness?

Q35

Respondent skipped this question

What impact would geo-awareness likely have on you?

Page 9

Q36

Respondent skipped this question

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Q37

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

PROACTIVELY RELEASED BY
THE MINISTRY OF TRANSPORT

#56

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, May 21, 2021 12:38:59 PM
Last Modified: Friday, May 21, 2021 12:50:20 PM
Time Spent: 00:11:21
IP Address: [REDACTED]

Page 1

Q1 **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Mike Hartley

Q3

Email address

[REDACTED]

Q4

Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

I am an R/C pilot of fixed wing and rotary aircraft

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

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Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Stop trying to make money of everything.

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

No,

Please comment::

Just making it harder for hobbyists and easier for your business owning cronies.

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

No,

Please comment:

See above comment

Q10

Are there any other problems and opportunities you can think of?

If I did identify any other ideas I wouldn't tell you.

Q11

Do you agree with the proposed order of implementation of the measures?

No,

Please comment:

Stop ruining people's hobbies

Page 4

Q12

Should drones have their own standalone Rule Part?

No

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

No

Q14

Should we change the requirement to gain consent to fly above property?

No – keep the existing consent provision

Q15

Should we change the requirement to gain consent to fly above people?

No – keep the existing requirement

Q16

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Other (please specify):

10km

Q17

Are there any other major Rules changes we should consider?

Respondent skipped this question

Q18

Are there any minor changes to the Rules that would make them easier for you to understand?

No

Q19

What do you think of the proposed minor Rules changes?

Crap

Q20

Are there any other changes we should consider?

No stop changing the rules every 5 seconds and give people a chance to learn and understand the current rules

Page 5

Q21

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

No

Q22

What impact would a basic pilot qualification likely have on you?

Respondent skipped this question

Q23

What format should this test take?

Other (please specify):

Non

Q24

Should there be a minimum age for basic pilot qualification?

No

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Q25

No

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27

No

Should we introduce the proposed drone registration system?

Q28

Respondent skipped this question

What impact would drone registration likely have on you?

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Crap

Q30

No

Should there be a minimum weight threshold for registering a drone?

Q31

Should certain drones not need to be registered (select all that apply)

Yes, drones flown solely indoors,

Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)

,

Yes, others (please specify below),

Please comment:

All flying models for hobby use

Page 7

Q32

No

Should we introduce remote ID?

Q33

Respondent skipped this question

What impact would remote ID likely have on you?

Page 8

Q34

No

Should we consider introducing geo-awareness?

Q35

Respondent skipped this question

What impact would geo-awareness likely have on you?

Page 9

Q36

Respondent skipped this question

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

PROACTIVELY RELEASED BY
THE MINISTRY OF TRANSPORT

#57

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, May 21, 2021 10:55:05 AM
Last Modified: Friday, May 21, 2021 1:06:45 PM
Time Spent: 02:11:40
IP Address: [REDACTED]

Page 1

Q1 **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Cameron Baker

Q3

Email address

[REDACTED]

Q4

Who are you submitting on behalf of?

Other,

If you are not submitting as an individual, please specify who you represent.:

Envico Technologies Ltd, Syos Aerospace Ltd

Q5

Briefly tell us your interest in drones

Heavy lift UAS Services and UAS Manufacturing and Export

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

PROACTIVELY RELEASED BY THE MINISTRY OF TRANSPORT

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

1. Rules Change - Part 102 has been great to service the innovation of the drone sector in the R&D stages. However, when one wishes to mature the service offering it is challenging to establish a professional standard, particularly when exporting products and services. An update to the rules must consider the translation between an R&D stage where flexibility is required, to maturing services where standardisation is required, to export where standards are acceptable to the receiving jurisdiction/customer.

We recommend that a tier system of qualification helps facilitate the shift from recreation>R&D>Commercial>export. We also strongly suggest that the CAA develop a framework for standardising scenarios and create a categorising mechanism for processing applications. There is a considerable push for innovation and development in the sector however a choke point in the assessment and processing of applications regardless of the complexity. This suggestion is to consider mechanisms that address the block but allows safe and efficient operations.

Continuing with rule change, we strongly suggest that they align with manned standards particularly when companies look to export. NZ cannot sustain a saturated drone market for services and as such will need to export.

2. Pilot Qualification – In addition to the pilot qualification suggested by the MoT, we suggest that operators have a licensing pathway that reflects manned ratings and licensing seen in Part 61, 66. This will allow Part 141 organisations to develop suitable qualifications that meet a manned standard. We do not back a separated system as there is already a current framework that is clear for one party. This means we only need to identify and understand how the drone addition will fit.

We also suggest that we create a rule that shifts a certified operator from a 102 into a professional rule part that is created or is formed by new subparts to current Parts in manned aviation. We believe this will give the CAA opportunity to develop recognised standard operating procedures and a framework for categorising R&D from known repeatable operations, agnostic of the platform which can be factored by weight/risk/type.

This pilot qualification needs to also provide a link to what happens next. If they wish to go to the next level, they need to be aware of that somewhere.

3. Drone Registration – Drone registration in larger organisations is required for asset control and maintenance control. For smaller operators, registration may be meaningless apart from providing a number to regulators. There may be risk that registered drones could supply numbers of drones in NZ however not be an accurate measure of those used. We believe registration becomes useful at a higher level to support maintenance and asset control. This process may be useful for smaller operators as a steppingstone to higher compliance.

As a suggestion, you'd get informative data from registration if the user supplied information about the vehicles intended use or if this was defaulted from the manufacturer. i.e. ag use, commercial use, recreational use.

All 102 operators have registered their drones.

4. Remote Identification – We are proposing to use remote identification on our units in the same form a manned operator would be required ADSB. If we are looking to mandate technology is required, it needs to be clear as to why, it needs to be specific to operations, it needs to be fair across all aviation not just unmanned.

Our proposed operations are <400ft. night and day, in rural locations. We will file NOTAMs and have ADSB and have collision avoidance systems. We can see more than a manned operator however are the ones that are being requested to do more. If the push is not applied to all of aviation, then there will be understandable rebuttal.

Lastly on remote ID, my operations are not public, nor does it need to be. Who is the MoT providing this information to? And how is it being used? If enforcement, then we are large operators and can be easily distinguished. So what benefit are we proposing? If this is for smaller aircraft that are common for taking pictures, then we suggest you require the manufacturer to produce a RID on the unit of those in a certain category rather than the entire UAS fleet of NZ. For those home built in that category, we suggest the education in pilot training make it clear what they need as a check list.

5. Geo-awareness – Our aircraft drop articles, like ag spraying/fert and/VTA, there is a level of Geo-awareness required. This is

sometimes carried out by an operator in VLOS or sensors. We suggest that again, the suggestion is categorised and clearly defined in standard scenarios. If people want to deviate from the standard, then geo-awareness may be required. We strongly advise on the need to mandate this need on all parties as it is very much operation dependant.

As a suggestion, operators could be exempt from this if they are operating in a particular area, height, type of operation, if NOTAMs or other mitigators can be applied etc.

Agreed if this operation moves in to integrated airspace but not all operations are or will be.

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

Yes, with changes ,

Please comment::

yes, there needs to be consideration for a set of stages an operator will progress through. Part 102 is suitable for R&D but prohibitive to standardisation which has implication on processing times. Licences, certifications and restrictive recreational rules works in this case. Also providing standardised scenarios will help. A frame work needs to be in place for the CAA to deal with the change.

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

Yes, with changes ,

Please comment:

It will not address all problems and creates others. Problems arising are around export and standardisation with other jurisdictions. We suggest that we intergrate in to the manned parts using sub parts. It is a known format and one that can get input from both manned SME and UA SME. building another standard will lower the credibility of the industry and mean we are waiting on unilateral standard building from the international community. We have an opportunity to create clear pathways for export now using current frameworks.

Q10

Are there any other problems and opportunities you can think of?

Part 102 supports R&D, this new rule needs to address standards, licencing, certification and subparts within all manned parts. This is a clear way of intergration to standards that are known. CAA need to support 102 for R&D and develop standard scenarios for mature operations. this takes the problem away from CAA as it's a cookie cutter exercise. We also suggest there is scope for third parties to be endorsed under the new rule to carry out functions of the CAA. Lastly we strongly suggest CAA have a sebatical in industry.

Q11

Do you agree with the proposed order of implementation of the measures?

Yes,

Please comment:

We suggest a rethink on timing, some items proposed can be inacted faster than suggested.

Enabling Drone Integration

Q12

Should drones have their own standalone Rule Part?

Yes,

Please comment:

Only to provide a professional standardised frame work once out of 102. We suggest it draws on or develops Subparts to current standards for intergration. Also to build a framework for the CAA to asses mature UA uses.

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

Yes,

Please comment:

Ristrict is under a teir system. Allow operators to gain permissions under licencing and certification.

Q14

Should we change the requirement to gain consent to fly above property?

Yes – relax the consent provision in another way,

Please comment:

Safe distances are ok, risk is also another way. As an example manned heli pilots conducting powerline surveys across auckland - they are low flying and blow fences and trampolines around. Yet there are tighter rules on a small drone.

Q15

Should we change the requirement to gain consent to fly above people?

Yes – relax the requirement in another way,

Please comment:

distance and risk. Actually standardise what that risk is.

Q16

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Other (please specify):

depending on the safe stopping distance, 10m min

Q17

Are there any other major Rules changes we should consider?

1. Create subparts to manned rules 61, 66, 145, 146, 148, 147, 21, 141,
2. Tier system for restriction of use, licencing to certified user
3. Stardise scenarios
4. Provision for a third party to carry out fuctions of the CAA
5. Mandated use of R.ID, Geo-awareness
6. Exporting pathways and how the rule change will reflect on that.
7. Identify what an importer needs and what is considered transferable. Where can they fly under what conditions that will enable investment in to the industry.

Q18

Are there any minor changes to the Rules that would make them easier for you to understand?

Yes,

Please comment:

Define the next steps for an operator to progress from one tier to the other. Provide clarity around what is acceptable from international companies coming in to NZ. Identify areas where testing can occur.

Q19

What do you think of the proposed minor Rules changes?

Fine

Q20

Are there any other changes we should consider?

As above

Page 5

Q21

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Yes, with changes ,

Please comment:

Have additional training addressed and steps of what they need to progress to the next stage. Provide it online for international pilots to complete.

Q22

What impact would a basic pilot qualification likely have on you?

All pilots under 102 need to hold a pilot qualification from a 141. So it has impact only on the external factors of our company such as social benefits and education.

Q23

What format should this test take?

Electronic/online theory test

Q24

Should there be a minimum age for basic pilot qualification?

No

Q25

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

No,

Please comment:

remove the 101.202 provider. We suggest one standard and that is 141. If there is a requirement for 101.202, then develop a subpart under 141 that meets specific 101.202 needs.

Q26

Is there any other special authorisations you would like to see?

We want to see part 66, 61, 147, 145, 148, 146, 141, 21 subparts developed.

Page 6

Q27

Should we introduce the proposed drone registration system?

Yes, with changes,

Please comment:

Categorise what needs to be registered. 102 already register so your target is 101? if so then get buy in from the manufacturer so they are resistering all drones with the CAA that are imported in to nz. If they are hobby drones then provide a platform for those to be registered online. Scope how important registration of every drone is. What are they used for and how is that important. Numbers of drones and how active they are, are very different.

Q28

What impact would drone registration likely have on you?

Again industry social benefits, bring new users in to the aviation side. We expect that will allow them to focus on maintenace benefits and asset management if they moved from recreation to commercial.

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Remote id and tracking means the tracker needs to be in the right place at the right time. If you want people out of the space then mandate systems that do not allow the unit to fly in the airspace. This can be done through the firmware companies as demonstrated by DJI. others are Ardupilot etc. if you continue to get non-compliance then they are actively breaking the rules. Enforcement can take place only if the enforcer is equipped to do so.

Q30

Should there be a minimum weight threshold for registering a drone?

No,

Please comment:

all technology gets smaller.

Q31

Should certain drones not need to be registered (select all that apply)

No,

Please comment:

whats stopping these drones being used in other areas? the operator and the flight software.

PROACTIVELY RELEASED BY THE MINISTRY OF TRANSPORT

Q32

Should we introduce remote ID?

No,

Please comment:

a compliant operator will likely have these as default in the form of ADSB. not all operations will have access to wifi and bluetooth will not allow you to get the distance to get a signal. Other mitigators are in place such as NOTAMs. If putting remote id is for safety than an alternative is to create a tiered operating system with licences, certification, and restrictive operations or standards. if it's to track and enforce non-compliance then you are likely to be enforcing camera drone recreational users who you are looking to educate in the pilot qualification. you are now looking at enforcement of people who have been educated and are still breaking the rules. If they know they are breaking the rules will they put a remote ID on their unit? probably not. For airspace intergration, remote id with ADSB works fro the drone side but needs to inform the manned operator also. Two ways, a manned pilot now needs capability to view and avoid drones or control the airspace. drones will have a planned flight path, set speed altitude etc. a manned flight can do the same but has more flexibility so it will need a combined education effort for airspace intergration.

Q33

What impact would remote ID likely have on you?

We have ADSB. Having another form as mentioned above goes down two routes, enforcement which is presented in the education piece and intergration with manned operators being more compliant. Theres alot of pressure for compliant operators to meet the standard and not alot about what we are being asked to do over everyone else. innovation safety and effeciency need to be considered if the goal is to be an international hub

Page 8

Q34

Should we consider introducing geo-awareness?

Yes,

Please comment:

Use software companies as you are only looking to control 101 users. Everyone else is approved to operate by the CAA with 102 or other. It whouldn't be a blanket mandate but scenario based.

Q35

What impact would geo-awareness likely have on you?

if you mandate it to all, then it would be a fical expence. we also need to know what systems this includes as it needs to be useful to inform flight decisions. That means some form of automated action by the flight control system and the CAA need to be open to that otherwise we are just adding benefit for the regulator.

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

We strongly support the intergration of a new rule forming subparts to the existing framework. This is critical to establishing credibility for export and gain a competitive advantage for.

A tierd system as recomended by UAVNZ supports standardisation and professionalism when moving through the brackets of recreational user, to commercial and then exporter. We support licencing and certification in line with new subparts in the existing framework. These are Part 21, 61, 66, 71, 103, 141, 143, 145, 146, 147, 148.

Q37

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

PROACTIVELY RELEASED BY
THE MINISTRY OF TRANSPORT

#58

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, May 21, 2021 11:50:09 AM
Last Modified: Friday, May 21, 2021 1:30:08 PM
Time Spent: 01:39:58
IP Address: [REDACTED]

Page 1

Q1 Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Michael Nieuwlands

Q3

Email address

[REDACTED]

Q4 Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

Interested in the regulation and control of their use, in relation to privacy, noise, safety and any other obstructions to general quality of life.

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Measures that provide effective public drone/operator identification should be implemented immediately, otherwise rules are a waste of time.

Q8

Yes

Do you think the proposed series of measures would help achieve the desired objectives?

Q9

Yes,

Please comment:

It's got to be better than the existing free-for-all.

Do you think the proposed series of measures would address the problems and opportunities identified?

Q10

Respondent skipped this question

Are there any other problems and opportunities you can think of?

Q11

Yes

Do you agree with the proposed order of implementation of the measures?

Page 4

Q12

Yes

Should drones have their own standalone Rule Part?

Q13

I don't know,

Please comment:

I do not have the technical expertise or qualifications to answer this.

Should we review the four-kilometre minimum flight distance from aerodromes?

Q14

No – keep the existing consent provision,

Please comment:

Any prescribed separation will eventually become useless as the technical abilities of drones and cameras evolve.

Should we change the requirement to gain consent to fly above property?

Q15

No – keep the existing requirement,

Please comment:

Any prescribed separation will eventually become useless as the technical abilities of drones and cameras evolve.

Should we change the requirement to gain consent to fly above people?

Q16

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Other (please specify):

NONE

Q17

Are there any other major Rules changes we should consider?

Respondent skipped this question

Q18

Are there any minor changes to the Rules that would make them easier for you to understand?

I don't know

Q19

What do you think of the proposed minor Rules changes?

Respondent skipped this question

Q20

Are there any other changes we should consider?

Respondent skipped this question

Page 5

Q21

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Yes

Q22

What impact would a basic pilot qualification likely have on you?

Greater safety as a member of the public?

Q23

What format should this test take?

Electronic/online theory test

Q24

Should there be a minimum age for basic pilot qualification?

Yes, 14 years

Q25

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

I don't know

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27

Yes,

Should we introduce the proposed drone registration system?

Please comment:
Already commented.

Q28

What impact would drone registration likely have on you?

Ability to have responsibility for drone incidents imposed on the operator.

Q29

Respondent skipped this question

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Q30

No,

Should there be a minimum weight threshold for registering a drone?

Please comment:
A drone is a drone is a drone. Complicates the process, individuals may claim they didn't know the weight. ANY object falling from the sky is potentially dangerous.

Q31

No,

Should certain drones not need to be registered (select all that apply)

Please comment:
For how long is a drone only going to be flown indoors, realistically?

Page 7

Q32

Yes,

Should we introduce remote ID?

Please comment:
Logical, really.

Q33

Respondent skipped this question

What impact would remote ID likely have on you?

Page 8

PROACTIVELY RELEASED BY
THE MINISTRY OF TRANSPORT

Enabling Drone Integration

Q34

Should we consider introducing geo-awareness?

Yes,

Please comment:

Anything that makes them safer.

Q35

What impact would geo-awareness likely have on you?

Respondent skipped this question

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

This should have done years ago.

Q37

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

Respondent skipped this question

PROACTIVELY RELEASED BY
THE MINISTRY OF TRANSPORT

#59

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, May 21, 2021 3:29:34 PM
Last Modified: Friday, May 21, 2021 4:11:29 PM
Time Spent: 00:41:54
IP Address: [REDACTED]

Page 1

Q1 Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Karyn McQuade

Q3

Email address

[REDACTED]

Q4 Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

Would not like to see use of drones over private property without the owner of that property's permission

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

PROACTIVELY RELEASED BY
THE MINISTRY OF TRANSPORT

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Most definitely need more regulation around drones for safety reasons and so they are not 'misused'

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

I don't know,

Please comment::

Needs to be requirement of permission from property owner for drones to fly overdue to their lower flight paths

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

I don't know

Q10

Are there any other problems and opportunities you can think of?

Especially in rural sector or areas with stock, I believe these should be no-fly zones unless permission from the property owner. Having a drone buzzing around overhead would be like having a dog loose amongst the stock. A recipe for disaster. This is especially so with equines/horses. Riders are losing more and more places to ride. Horses are flight animals and an unknown drone buzzing overhead could lead to a serious accident. We have enough trouble when small aircraft manoeuvre overhead, let alone something at a lower flight path.

On farms I also believe this would lead to more property theft as it would make it easier to scope out properties from afar.

Q11

Do you agree with the proposed order of implementation of the measures?

No,

Please comment:

Look at requirements around land owner permissions

Page 4

Q12

Should drones have their own standalone Rule Part?

Yes

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

Yes

Q14

Should we change the requirement to gain consent to fly above property?

No – keep the existing consent provision,

Please comment:

Would create too many problems with stock and safety issues with riders on horses. Could also lead to more breakins as gives thieves another tool to scope out properties 'legally'. Who can clarify what the 'safe' distance is. Someone flying near a horse and rider may have no idea how flighty a horse can be and their idea of 'safe' could be totally different to a distance that will actually be required

Q15

Should we change the requirement to gain consent to fly above people?

No – keep the existing requirement,

Please comment:

Again. A health and safety issue. Drones aren't always bomb proof and can fail, thereby possibly causing injury of falling into a crowd

Q16

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Other (please specify):

At least 50 or more. If the controller lost contact the drone could easily cover that distance during its fall

Q17

Are there any other major Rules changes we should consider?

Respondent skipped this question

Q18

Are there any minor changes to the Rules that would make them easier for you to understand?

I don't know

Q19

What do you think of the proposed minor Rules changes?

Don't change requirement for property owner's permission

Q20

Are there any other changes we should consider?

Don't change requirement for property owner's permission

Page 5

Q21

Yes

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Q22

What impact would a basic pilot qualification likely have on you?

None. If I need it I'll do it

Q23

Electronic/online theory test

What format should this test take?

Q24

No

Should there be a minimum age for basic pilot qualification?

Q25

Yes

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27

Yes

Should we introduce the proposed drone registration system?

Q28

What impact would drone registration likely have on you?

None

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Keep it simple

Q30

I don't know

Should there be a minimum weight threshold for registering a drone?

Q31 **Yes, drones flown solely indoors,**
Should certain drones not need to be registered (select all that apply) **Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)**

Page 7

Q32 **I don't know**
Should we introduce remote ID?

Q33
What impact would remote ID likely have on you?
None

Page 8

Q34 **Yes**
Should we consider introducing geo-awareness?

Q35
What impact would geo-awareness likely have on you?
None

Page 9

Q36
Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Don't change things regarding permissions required for flying over private property. There are too many Health and Safety considerations to people on the ground that could be injured due to drones flying over causing stock to startle. The nature of the human race means there are people who don't have others best interests at heart and the changes to permissions required makes it easier for drones to be used to aid in illegal activities

Q37 **Respondent skipped this question**
If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

#60

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, May 21, 2021 4:04:25 PM
Last Modified: Friday, May 21, 2021 4:20:49 PM
Time Spent: 00:16:23
IP Address: [REDACTED]

Page 1

Q1 Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Beth Lamb

Q3

Email address

Q4

Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

Concerned at the trauma this could inflict. Drones near livestock could cause injury due to panic. A drone near a horse event could endanger the lives of riders and spectators as some horses do not react well to the sound and sight of drones.

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Drones should never be allowed near events with horses as there is very real and significant risk of horses spooking or reacting badly to the drone. Flying a drone over paddocks and livestock can also cause panic and injuries to those trying to work with animals.

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

No,

Please comment::

There would never be all opporaters acting in an empathetic and responsible way.

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

No

Q10

Are there any other problems and opportunities you can think of?

Respondent skipped this question

Q11

Do you agree with the proposed order of implementation of the measures?

No

Page 4

Q12

Should drones have their own standalone Rule Part?

No ,

Please comment:

I would never want my right to refuse consent to have drones fly over my property revoked.

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

No

Q14

Should we change the requirement to gain consent to fly above property?

No – keep the existing consent provision,

Please comment:

This is a health and safety issue.

Q15

Should we change the requirement to gain consent to fly above people?

No – keep the existing requirement,

Please comment:

This is a privacy and safety issue.

Q16

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Other (please specify):
800m to 1km

Q17

Are there any other major Rules changes we should consider?

Respondent skipped this question

Q18

Are there any minor changes to the Rules that would make them easier for you to understand?

No

Q19

What do you think of the proposed minor Rules changes?

Respondent skipped this question

Q20

Are there any other changes we should consider?

Respondent skipped this question

Page 5

Q21

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Yes, with changes ,
Please comment:
18yrs of age min.

Q22

What impact would a basic pilot qualification likely have on you?

Respondent skipped this question

Q23

What format should this test take?

A practical examination of skill and a paper based written theory test (at a provider)

Q24

Should there be a minimum age for basic pilot qualification?

Yes, other age (please specify):
18 at least.

Q25

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

I don't know

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27

Yes

Should we introduce the proposed drone registration system?

Q28

Respondent skipped this question

What impact would drone registration likely have on you?

Q29

Respondent skipped this question

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Q30

No

Should there be a minimum weight threshold for registering a drone?

Q31

No

Should certain drones not need to be registered (select all that apply)

Page 7

Q32

Yes,

Should we introduce remote ID?

Please comment:

A small darting around in the sky could be hard to spot a number but a signal may assist.

Q33

Respondent skipped this question

What impact would remote ID likely have on you?

Page 8

Q34

Yes,

Should we consider introducing geo-awareness?

Please comment:

All areas were horse events should be kept safe as well as private properties who object should be able to be clearly identified.

Q35

Respondent skipped this question

What impact would geo-awareness likely have on you?

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

If riding a horse on a road and it was spooked by a drone this could very easily result in deaths.

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

PROACTIVELY RELEASED BY
THE MINISTRY OF TRANSPORT

#61

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, May 21, 2021 6:37:03 PM
Last Modified: Friday, May 21, 2021 7:03:21 PM
Time Spent: 00:26:17
IP Address: [REDACTED]

Page 1

Q1 **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Richard Sutherland

Q3

Email address

[REDACTED]

Q4

Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

Long term hobbyist

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

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Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

This CAA proposal represents the poorest form of regulation, since:

- a) it is unjustified - trying to address a perceived issue that doesn't exist.
- b) it is based on ignorance - there is no scientific evidence to suggest a weight limit as low as 250 grams.
- c) will be ineffective - there are already regulations which place restrictions around airports. Those that currently ignore the existing regulations are unlikely to register under the proposed regulations.
- d) will deflect CAA resources away from REAL issues - there fatalities and serious incidents in manned aviation in NZ each and EVERY year! (compared to ZERO fatalities from recreational drones WORLDWIDE EVER.
- e) it is a blatant revenue raising exercise - an annual TAX for registration? Do ultralights, hang gliders and paragliders have to pay CAA an annual tax?.

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

No,

Please comment::

How about some EVIDENCE based policy - In the 10 years since recreational multi-rotors have been around, there have been ZERO fatalities worldwide ever! Compare this to shockingly poor safety record of manned aircraft in NZ where there are fatalities, and serious incidents year after year after year!

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

No

Q10

Are there any other problems and opportunities you can think of?

Serious lack of understanding of Risk Identification, Risk Assessment and Risk Mitigation by CAA.

Q11

Do you agree with the proposed order of implementation of the measures?

No

Page 4

Q12

Respondent skipped this question

Should drones have their own standalone Rule Part?

<p>Q13</p> <p>Should we review the four-kilometre minimum flight distance from aerodromes?</p>	<p>Yes</p>
<p>Q14</p> <p>Should we change the requirement to gain consent to fly above property?</p>	<p>Yes – remove the consent provision completely, Please comment: The consent provision was absolutely ridiculous from the start.</p>
<p>Q15</p> <p>Should we change the requirement to gain consent to fly above people?</p>	<p>Yes – remove the requirement completely</p>
<p>Q16</p> <p>If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?</p>	<p>10 metres</p>
<p>Q17</p> <p>Are there any other major Rules changes we should consider?</p>	<p>Respondent skipped this question</p>
<p>Q18</p> <p>Are there any minor changes to the Rules that would make them easier for you to understand?</p>	<p>Yes, Please comment: Simple: 1) don't fly above 400ft 2) don't fly within X distance of an Airport 3) don't endanger people or property that's it!</p>
<p>Q19</p> <p>What do you think of the proposed minor Rules changes?</p>	<p>Respondent skipped this question</p>
<p>Q20</p> <p>Are there any other changes we should consider?</p>	<p>Respondent skipped this question</p>
<p>Page 5</p>	
<p>Q21</p> <p>Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?</p>	<p>No</p>

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Q22

What impact would a basic pilot qualification likely have on you?

It would confirm CAAs incompetence.

Q23

What format should this test take?

Other (please specify):
none

Q24

Should there be a minimum age for basic pilot qualification?

Yes, other age (please specify):
Let kids participate in the hobby, and gain an interest in STEM subjects.

Q25

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Respondent skipped this question

Q26

Is there any other special authorisations you would like to see?

Respondent skipped this question

Page 6

Q27

Should we introduce the proposed drone registration system?

No,
Please comment:
he proposed registration scheme MUST be changed to: a) allow children to participate in the sport, b) remove the requirement to pay an ANNUAL TAX for no benefit. c) distinguish between "multi-rotors" and "fixed-wing" models, and d) the exempt weight must be increased to at least 500 grams for "multi-rotors" and 1000 grams for "fixed-wing" models.

Q28

What impact would drone registration likely have on you?

Further confirm CAAs incompetence.

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Unnecessary and ridiculous overreach.

Q30

Should there be a minimum weight threshold for registering a drone?

Yes, but with a different weight as the threshold ,

Please comment:

Should be based on evidence, which would indicate a threshold of around 2000 grams. I would suggest an absolute minimum threshold of 500 grams for multi-rotors and 1000 grams for fixed wing must be used. Fixed wings consist of lightweight foam or balsa, and contain much less solid components than a equivalent weight multi-rotor.

Q31

Should certain drones not need to be registered (select all that apply)

Yes, others (please specify below),

Please comment:

No recreational drones should be required to be registered if flown at model clubs, and only if they are above a 'evidenced based' weight otherwise.

Page 7

Q32

Should we introduce remote ID?

No,

Please comment:

Absolutely unjustified, adds an unreasonable cost to hobbyists who have operated safely for decades, and relies on technology that does not exist in a practical perspective (cost, weight, reliability). Also provides no actual benefit.

Q33

What impact would remote ID likely have on you?

Further confirm CAAs incompetence.

Page 8

Q34

Should we consider introducing geo-awareness?

No

Q35

What impact would geo-awareness likely have on you?

Further confirm CAAs incompetence.

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

CAA needs to wake up to the reality of FPV operations. FPV technology provides the pilot a far greater situational awareness and field of view than any 'spotter' can.

The current restrictions (ban) on flying FPV with harmless toys that can weigh under 20 grams must be revoked. CAA should start doing its job, and prevent the unacceptable number of manned aviation fatalities that occur year after year after year in NZ, instead of hassling safe hobbyists!

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

PROACTIVELY RELEASED BY
THE MINISTRY OF TRANSPORT

#62

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, May 21, 2021 9:21:42 PM
Last Modified: Friday, May 21, 2021 9:29:57 PM
Time Spent: 00:08:15
IP Address: [REDACTED]

Page 1

Q1 Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Michelle Wakelung

Q3

Email address

[REDACTED]

Q4

Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

Concerned of the effects drones will have on livestock

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

PROACTIVELY RELEASED BY
THE MINISTRY OF TRANSPORT

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Should not be allowed on private property unless in a emergency/police situation

Q8

No

Do you think the proposed series of measures would help achieve the desired objectives?

Q9

No

Do you think the proposed series of measures would address the problems and opportunities identified?

Q10

Are there any other problems and opportunities you can think of?

Should not be allowed on properties with livestock without permission of the landowner

Q11

No

Do you agree with the proposed order of implementation of the measures?

Page 4

Q12

I don't know

Should drones have their own standalone Rule Part?

Q13

No

Should we review the four-kilometre minimum flight distance from aerodromes?

Q14

No – keep the existing consent provision

Should we change the requirement to gain consent to fly above property?

Q15

No – keep the existing requirement

Should we change the requirement to gain consent to fly above people?

Q16

Respondent skipped this question

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Q17

Respondent skipped this question

Are there any other major Rules changes we should consider?

Q18

I don't know

Are there any minor changes to the Rules that would make them easier for you to understand?

Q19

Respondent skipped this question

What do you think of the proposed minor Rules changes?

Q20

Respondent skipped this question

Are there any other changes we should consider?

Page 5

Q21

Yes, with changes

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Q22

Respondent skipped this question

What impact would a basic pilot qualification likely have on you?

Q23

Paper based written theory test (at a provider)

What format should this test take?

Q24

Yes, 16 years

Should there be a minimum age for basic pilot qualification?

Q25

Respondent skipped this question

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27

Yes

Should we introduce the proposed drone registration system?

Q28

Respondent skipped this question

What impact would drone registration likely have on you?

Q29

Respondent skipped this question

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Q30

Respondent skipped this question

Should there be a minimum weight threshold for registering a drone?

Q31

Yes, drones flown solely indoors,

Should certain drones not need to be registered (select all that apply)

Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)

Page 7

Q32

Yes

Should we introduce remote ID?

Q33

Respondent skipped this question

What impact would remote ID likely have on you?

Page 8

Q34

I don't know

Should we consider introducing geo-awareness?

Q35

Respondent skipped this question

What impact would geo-awareness likely have on you?

Page 9

Q36

Respondent skipped this question

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

PROACTIVELY RELEASED BY
THE MINISTRY OF TRANSPORT

#63

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Saturday, May 22, 2021 7:02:47 AM
Last Modified: Saturday, May 22, 2021 7:14:25 AM
Time Spent: 00:11:37
IP Address: [REDACTED]

Page 1

Q1 Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Kylie Macdonald

Q3

Email address

[REDACTED]

Q4 Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

I'm a property owner/livestock owner.

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Agree with these.

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

I don't know,

Please comment::

Unsure what the current rules based the proposed new rules are?

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

I don't know

Q10

Are there any other problems and opportunities you can think of?

I do not want drones flying within my property boundary without my consent.

Q11

Do you agree with the proposed order of implementation of the measures?

Respondent skipped this question

Page 4

Q12

Should drones have their own standalone Rule Part?

No ,

Please comment:

No way should drones be allowed on top of private property without consent. Too many uninformed people who will cause injury and stress to animals and wreck property.

Q13

Should we review the four kilometre minimum flight distance from aerodromes?

No

Q14

Should we change the requirement to gain consent to fly above property?

No – keep the existing consent provision,

Please comment:

Definitely NOT!

Q15

Should we change the requirement to gain consent to fly above people?

No – keep the existing requirement,

Please comment:

People are entitled to be safe and have privacy.

Q16

Respondent skipped this question

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Q17

Respondent skipped this question

Are there any other major Rules changes we should consider?

Q18

Respondent skipped this question

Are there any minor changes to the Rules that would make them easier for you to understand?

Q19

Respondent skipped this question

What do you think of the proposed minor Rules changes?

Q20

Respondent skipped this question

Are there any other changes we should consider?

Page 5

Q21

Yes

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Q22

Respondent skipped this question

What impact would a basic pilot qualification likely have on you?

Q23

Respondent skipped this question

What format should this test take?

Q24

Respondent skipped this question

Should there be a minimum age for basic pilot qualification?

Q25

Respondent skipped this question

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27

Yes

Should we introduce the proposed drone registration system?

Q28

Respondent skipped this question

What impact would drone registration likely have on you?

Q29

Respondent skipped this question

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Q30

Respondent skipped this question

Should there be a minimum weight threshold for registering a drone?

Q31

Respondent skipped this question

Should certain drones not need to be registered (select all that apply)

Page 7

Q32

Respondent skipped this question

Should we introduce remote ID?

Q33

Respondent skipped this question

What impact would remote ID likely have on you?

Page 8

Q34

Yes

Should we consider introducing geo-awareness?

Q35

Respondent skipped this question

What impact would geo-awareness likely have on you?

Page 9

Q36

Respondent skipped this question

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

PROACTIVELY RELEASED BY
THE MINISTRY OF TRANSPORT

#64

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Saturday, May 22, 2021 2:35:52 PM
Last Modified: Saturday, May 22, 2021 2:51:49 PM
Time Spent: 00:15:57
IP Address: [REDACTED]

Page 1

Q1 Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Steve Bates

Q3

Email address

[REDACTED]

Q4 Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

Recent owner Mavic Air 2

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Think they are great improvements though please don't outsource qualifications to outside providers as they simply charge too much for the average drone pilot. The online questionnaire is the best way.

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

Yes, with changes ,

Please comment::

I know the document outlines the permission of people photographed but this this needs to be removed completely in public places. I've had my photo taken thousands of times by cell phones and cameras in public places and there are no rules around that. Rules should be consistent across the spectrum. Photos of a drone are generally much further away from people than other photos as well so hardly identifiable in most cases anyhow.

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

Yes, with changes ,

Please comment:

I think the whole photos in DOC and National Parks needs to be looked at. Why is it ok for photos to be taken by cameras and not drones? NZ is a stunning place and drone photography of these places get shared worldwide bringing in tourists that stimulate the economy. There should be a code of conduct at these places around safety and annoyance but to have to get an expensive permit is really disappointing.

Q10

Are there any other problems and opportunities you can think of?

Respondent skipped this question

Q11

Do you agree with the proposed order of implementation of the measures?

Yes

Page 4

Q12

Should drones have their own standalone Rule Part?

Yes

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

Yes

Q14 **Yes – use 'safe distances' as an alternative**

Should we change the requirement to gain consent to fly above property?

Q15 **Yes – use 'safe distances' as an alternative**

Should we change the requirement to gain consent to fly above people?

Q16 **10 metres**

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Q17 **Respondent skipped this question**

Are there any other major Rules changes we should consider?

Q18 **No**

Are there any minor changes to the Rules that would make them easier for you to understand?

Q19
What do you think of the proposed minor Rules changes?

Like them

Q20 **Respondent skipped this question**

Are there any other changes we should consider?

Page 5

Q21 **I don't know,
Please comment:
Will depend on if its the online option and NOT the paid outsourced provider option**

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Q22
What impact would a basic pilot qualification likely have on you?

I'm ok with or without it to be honest

Q23 **Electronic/online theory test**

What format should this test take?

Q24

Yes, 14 years

Should there be a minimum age for basic pilot qualification?

Q25

No,

Please comment:

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

They are not available in all places in NZ and charge too much. Fair enough for commercial use but not recreation

Q26

Is there any other special authorisations you would like to see?

No

Page 6

Q27

I don't know,

Please comment:

Should we introduce the proposed drone registration system?

Happy either way

Q28

What impact would drone registration likely have on you?

None

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Ok if it helps

Q30

I don't know

Should there be a minimum weight threshold for registering a drone?

Q31

No

Should certain drones not need to be registered (select all that apply)

Page 7

Q32

Yes

Should we introduce remote ID?

Q33

What impact would remote ID likely have on you?

SAfer for all

Page 8

Q34

Should we consider introducing geo-awareness?

Yes,
Please comment:
SAfer

Q35

What impact would geo-awareness likely have on you?

None

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

No

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

PROACTIVELY RELEASED BY
THE MINISTRY OF TRANSPORT

#65

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Saturday, May 22, 2021 2:35:23 PM
Last Modified: Saturday, May 22, 2021 2:58:54 PM
Time Spent: 00:23:31
IP Address: [REDACTED]

Page 1

Q1 Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Michael Warwick

Q3

Email address

[REDACTED]

Q4

Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

Professional Services firm making some use of a drone

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

The intent makes sense, some consideration needs to be made as to how existing drones can be updated to include identification technology as they are very light weight

Q8

Yes

Do you think the proposed series of measures would help achieve the desired objectives?

Q9

Yes

Do you think the proposed series of measures would address the problems and opportunities identified?

Q10

Respondent skipped this question

Are there any other problems and opportunities you can think of?

Q11

Respondent skipped this question

Do you agree with the proposed order of implementation of the measures?

Page 4

Q12

Yes

Should drones have their own standalone Rule Part?

Q13

Yes,

Should we review the four-kilometre minimum flight distance from aerodromes?

Please comment:

An online permission system would be great, currently not easy to get permission when aerodromes are not in use

Q14

No – keep the existing consent provision,

Should we change the requirement to gain consent to fly above property?

Please comment:

Online system where consent can be pre-approved, like Invercargill's public parks, would alleviate most of the problems. I still don't want drones over my home without my permission.

Q15

Yes – use 'safe distances' as an alternative

Should we change the requirement to gain consent to fly above people?

Q16

50 meters

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Q17

Respondent skipped this question

Are there any other major Rules changes we should consider?

Q18

Yes,

Are there any minor changes to the Rules that would make them easier for you to understand?

Please comment:

"Sheltered flight" should be made clearer, perhaps the proposed online training would achieve this?

Q19

Respondent skipped this question

What do you think of the proposed minor Rules changes?

Q20

Respondent skipped this question

Are there any other changes we should consider?

Page 5

Q21

Yes

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Q22

What impact would a basic pilot qualification likely have on you?

1/2 an hour one weekend.

Q23

Electronic/online theory test

What format should this test take?

Q24

No

Should there be a minimum age for basic pilot qualification?

Q25

I don't know

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27

Yes, with changes,

Should we introduce the proposed drone registration system?

Please comment:
Age is irrelevant

Q28

What impact would drone registration likely have on you?

None if there was no fee

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Appropriate

Q30

Should there be a minimum weight threshold for registering a drone?

Yes, with 250 grams as the weight threshold,

Please comment:

Toys still exist and are not in the same category so should be distinguished

Q31

Should certain drones not need to be registered (select all that apply)

Yes, drones flown solely indoors

Page 7

Q32

Yes

Should we introduce remote ID?

Q33

What impact would remote ID likely have on you?

More trust of drones

Page 8

Q34

Should we consider introducing geo-awareness?

Yes,

Please comment:

This capability is already on my drone and it is an older model

Q35

What impact would geo-awareness likely have on you?

I use the Aimap app and the airshare website so no impact

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Respondent skipped this question

Q37

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

Respondent skipped this question

PROACTIVELY RELEASED BY
THE MINISTRY OF TRANSPORT

#66

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Saturday, May 22, 2021 4:16:46 PM
Last Modified: Saturday, May 22, 2021 5:18:43 PM
Time Spent: 01:01:56
IP Address: [REDACTED]

Page 1

Q1 **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Hayden Collier

Q3

Email address

[REDACTED]

Q4 **Myself**

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

Recreational use mostly for artistic personal endeavours such as photography.

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

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Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

All areas of the proposed measures seem appropriate and positive. The use of drones commercially abs creatively under 101 rules currently seem limiting. From all the information currently available online there are clear areas that can be miss understood or hard to obtain the correct permissions of the governing body or owner. The reform will help drone pilots feel less limited while simultaneously being more educated on how and where to appropriately fly a drone. It should also help public acceptance of drone use.

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

Yes,

Please comment::

The measures are a positive way to progress the use of drones in New Zealand. These changes should cover all of New Zealand and not rely on local governing bodies as this leads to confusion and miss information. A broader approach to drone use is a way to achieve integration within this country.

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

Yes

Q10

Are there any other problems and opportunities you can think of?

Respondent skipped this question

Q11

Do you agree with the proposed order of implementation of the measures?

Yes

Page 4

Q12

Should drones have their own standalone Rule Part?

Yes,

Please comment:

The drone sector is extremely different to that of manned aircraft. Having an independent and clear rule part that covers drones solely would create a better understanding of the rules abs prevent miss-guidance or miss-information.

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

Yes,

Please comment:

A lot of aerodrome areas are largely unused by manned aircraft. Limiting altitude and creating awareness of limits in these areas would be more effective than blocking all drone activity here.

Q14

Should we change the requirement to gain consent to fly above property?

Yes – use 'safe distances' as an alternative,

Please comment:

The consent rule is one of the single most limiting factors of drone use. Requiring consent for everyone under the flight path of a drone is impractical and does not lead to the required safety standard it is trying to achieve. Safe distances should be sufficient to mitigate destruction of property from drone use while enabling creative and commercial use of drones that will feel less limiting. The only exception to this rule should be for conservation or doc controlled land as this poses a risk to wild life, specifically birds, as wildlife can have an adverse reaction to drone use and behave in a way that could bring a drone down, thus causing risk to the surrounding wildlife. These areas should be clearly marked and should require permission from doc to fly in.

Q15

Should we change the requirement to gain consent to fly above people?

Yes – use 'safe distances' as an alternative,

Please comment:

Drone operators should be aware of where their drone is in relation to people to make sure drones do not cause injury. Safe distances would enable this practice and would promote the awareness of the surroundings of which the drone is operating. This would help the public perception of drones as there would be an understanding of this required distance

Q16

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

10 metres

Q17

Are there any other major Rules changes we should consider?

Respondent skipped this question

Q18

Are there any minor changes to the Rules that would make them easier for you to understand?

Yes,

Please comment:

Selecting a place to fly a drone in Auckland feels very limited. Currently consent is required from the council to fly in regional parks, but it is also stated that drones are allowed to be flown in "most public places and parks". Beaches and coastal areas are specifically mentioned in information online as somewhere you require consent to fly. A broader guide of where drones can be flown in New Zealand is required, along with reforming or removing the consent rules, this could create a better understanding of where drones can actually fly.

Q19

What do you think of the proposed minor Rules changes?

It shows thought is actually being given to integrate drones into the airspace, rather than inappropriately limiting the use of the technology.

Q20

Respondent skipped this question

Are there any other changes we should consider?

Page 5

Q21

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Yes,

Please comment:

A basic understanding of the rules is a must for any drone operator. This would also give the opportunity to provided a standardised and clear understanding of the rules.

Q22

What impact would a basic pilot qualification likely have on you?

I would be excited to obtain a qualification. An official license would empower me to feel educated in this sector abs understand the rules and requirements placed on me. Much like sitting a car driver licence. It instills confidence.

Q23

Electronic/online theory test

What format should this test take?

Q24

Yes, 14 years

Should there be a minimum age for basic pilot qualification?

Q25

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Yes,

Please comment:

A lot of drone pilots have already sat paid training courses which I feel are in depth enough to remain relevant

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27

Yes

Should we introduce the proposed drone registration system?

Q28

What impact would drone registration likely have on you?

I would need to register my drone. This seems like a minor thing to do considering the nature of the device. Being responsible for a drone should be a requirement.

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Lining a drone to an operator is a sound idea and should lead to less miss-use of the tech.

Q30

Yes, with 250 grams as the weight threshold

Should there be a minimum weight threshold for registering a drone?

Q31

Yes, drones flown solely indoors,

Should certain drones not need to be registered (select all that apply)

Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)

Page 7

Q32

Should we introduce remote ID?

Yes,

Please comment:

Although I'm not sure it should be a requirement until all drones are equipped with this tech. It would also be hard to standardise and regulate considering the scope of the market.

Q33

What impact would remote ID likely have on you?

My drone has air sense, if this could be adapted for remote ID then I would surely use it.

Page 8

Q34

Yes

Should we consider introducing geo-awareness?

Q35

What impact would geo-awareness likely have on you?

A better understanding of where to fly would be achieved.

Page 9

Q36

Respondent skipped this question

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

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THE MINISTRY OF TRANSPORT

#67

COMPLETE

Collector: Web Link 1 (Web Link)
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Last Modified: Sunday, May 23, 2021 4:27:17 PM
Time Spent: 00:50:40
IP Address: [REDACTED]

Page 1

Q1 **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

John farmer

Q3

Email address

[REDACTED]

Q4

Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

Member of model flying nz, member of local model aircraft club

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

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THE MINISTRY OF TRANSPORT

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Rule update ok , pilot qualifications good idea

Drone registration ok if one number for pilot that can be used on all drones owned (many of ourclub have multiple aircraft)

Remote ID and geo awareness will i crease the cost of our hobby to the point that many clubs willfail

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

Yes, with changes ,

Please comment::

Changes must be simple to comply with and cheap if its difficult and expensive people won't comply

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

No,

Please comment:

You can't fix stupid, we have many road rules and safety checks , people still speed , crash and drive unsafe vehicles

Q10

Are there any other problems and opportunities you can think of?

Respondent skipped this question

Q11

Do you agree with the proposed order of implementation of the measures?

No,

Please comment:

Don't agree with remote id or geo awareness

Page 4

Q12

Should drones have their own standalone Rule Part?

Yes,

Please comment:

I think that the term drone should only relate to multi rotor craft, model aircraft being included with these will unfairly effect our hobby which will be the end of our hobby when we firmly believe that mfnz members are not the cause of any problems

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

No

Q14

Should we change the requirement to gain consent to fly above property?

Yes – use 'safe distances' as an alternative,

Please comment:

I would suggest a minimum height requirement

Enabling Drone Integration

Q15 **Yes – use 'safe distances' as an alternative,**
Should we change the requirement to gain consent to fly above people?
Please comment:
As above

Q16 **50 meters**
If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Q17 **Respondent skipped this question**
Are there any other major Rules changes we should consider?

Q18 **Yes,**
Are there any minor changes to the Rules that would make them easier for you to understand?
Please comment:
Please use common language as soon as legalise is used understanding will go down

Q19 **Respondent skipped this question**
What do you think of the proposed minor Rules changes?

Q20
Are there any other changes we should consider?
No

Page 5

Q21 **Yes, with changes ,**
Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?
Please comment:
MFNZ members already have a wings badge flying test ,including physical flying and legal requirements, so we should be exempt

Q22
What impact would a basic pilot qualification likely have on you?
None id we are exempt

Q23 **Other (please specify):**
What format should this test take?
Others would be too complex and expensive

Q24

Respondent skipped this question

Should there be a minimum age for basic pilot qualification?

Q25

I don't know

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27

Yes, with changes

Should we introduce the proposed drone registration system?

Please comment:

Single number for pilot that can be used on all models

Q28

What impact would drone registration likely have on you?

Very little as long as we don't have to register each model

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Will result in excessive cost to model flying nz

Q30

Should there be a minimum weight threshold for registering a drone?

Please comment:

250 g is far to light , most model aircraft weigh about 1_2 kg , we will now be in the same class as the models that now require certification (25kg)

Q31

Should certain drones not need to be registered (select all that apply)

Yes, drones flown solely indoors,

Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)

Please comment:

As before we are not the problem, we should not be punished with excessive rules , that most problem Pilots won't listen to any way

Page 7

Enabling Drone Integration

Q32

Should we introduce remote ID?

No,

Please comment:

Too expensive

Q33

What impact would remote ID likely have on you?

Having to give up a hobby that is safe , follows the caa rules now as well as local club rules, again MFNZ flying are not the problem

Page 8

Q34

Should we consider introducing geo-awareness?

No,

Please comment:

Again too expensive, our hobby will be destroyed

Q35

What impact would geo-awareness likely have on you?

Having to give up my hobby

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

I feel that because of a few idiots our hobby will be destroyed.

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

#68

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, May 24, 2021 12:10:46 AM
Last Modified: Monday, May 24, 2021 12:57:45 AM
Time Spent: 00:46:59
IP Address: [REDACTED]

Page 1

Q1 **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Stephanie Pearce

Q3

Email address

[REDACTED]

Q4

Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

Had one from our neighbour's son flying over our house and possibly taking pictures of my naked child in her own backyard. It was a very unpleasant experience.

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

I do not agree with no permission to fly over our private property. This is a clear breach of privacy in our own properties, and has safety and security implications including child safety.

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

Yes, with changes ,

Please comment::

Keep the requirement that permission is needed to fly (recreational) drones over private property. There is no need for private drones to fly over neighbouring properties without permission. It is a breach of privacy. I support compulsory licensing. I support compulsory identification. There needs to be a good education programme in place as it is very difficult to know who to complain to when drones are over your property.

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

Yes, with changes ,

Please comment:

I do not see how you can enforce a height limit. What is to stop anyone using a drone to see if you are home to commit a robbery or scope for things to steal?

Q10

Are there any other problems and opportunities you can think of?

As above.

Q11

Do you agree with the proposed order of implementation of the measures?

No,

Please comment:

I think more consideration needs to be given to breaching individual's privacy and safety in their own homes.

Page 4

Q12

Should drones have their own standalone Rule Part?

Yes

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

I don't know,

Please comment:

I do not know enough about aerodromes to comment.

Q14

Should we change the requirement to gain consent to fly above property?

No – keep the existing consent provision,

Please comment:

I feel very strongly about this. The safe distance would need to be very high and I do not see how you will enforce this, as you have stated that you can't at the moment! Is there any safe distance if a drone is going to crash on a child playing in their backyard? In our experience, our children came inside very scared of the drone flying over our house. It was very loud, buzzing and scary. It was very clearly visible and very low and I definitely found it unnerving and awful. We did not know who to complain to, and then we discovered it was our neighbours son and we insisted they tell their 14 year old that he was not to fly it over our house as my young daughter often played with very few clothes on. It was embarrassing to have to explain this to a neighbours teenage child and the parents and child were completely ignorant that it was illegal. They complied once I informed them of the problem. The information is clearly not communicated well and that should be your first priority.

Q15

Should we change the requirement to gain consent to fly above people?

No – keep the existing requirement,

Please comment:

Security and privacy in our own homes is vital. I could foresee if there were strict commercial rules eg for deliveries that this may become acceptable. I think if people use them for photography in particular then permission needs to be obtained. I think if they are to be allowed to fly over properties without permission we need very detailed recognition and licensing so that we know exactly WHO is flying over our house.

Q16

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Other (please specify):

At least 50 meters and clear education about how to judge that from the ground

Q17

Are there any other major Rules changes we should consider?

Respondent skipped this question

Q18

Are there any minor changes to the Rules that would make them easier for you to understand?

No

Q19

What do you think of the proposed minor Rules changes?

Respondent skipped this question

Q20

Are there any other changes we should consider?

Clear funding and strategy for increasing knowledge around the regulations and requirements. It is very vague and there is a lot of confusion about it and these changes will only make it worse.

Page 5

Q21

Yes

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Q22

What impact would a basic pilot qualification likely have on you?

More confidence that people know what they are doing and are aware of issues of privacy (especially with photograph/video capability) and also safety eg avoiding children or wildlife etc at all times.

Q23

Electronic/online theory test

What format should this test take?

Q24

Yes, 16 years

Should there be a minimum age for basic pilot qualification?

Q25

I don't know

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27

Yes,

Should we introduce the proposed drone registration system?

Please comment:

I can't believe we haven't got it already, Would help enormously and should have been thought of years ago.

Q28

What impact would drone registration likely have on you?

Better confidence that problems could be identified and solved. Better accountability for owners (including parents of children who 'own' them). Better awareness of responsibilities for owners.

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Just make it simple and affordable! Good luck.

Q30

Yes, with 250 grams as the weight threshold

Should there be a minimum weight threshold for registering a drone?

Q31

Yes, drones flown solely indoors,

Should certain drones not need to be registered (select all that apply)

Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)

Page 7

Q32

Should we introduce remote ID?

Yes,

Please comment:

Again, seems ridiculous that this hasn't been put in place immediately.

Q33

What impact would remote ID likely have on you?

Much more confidence that I know who is flying over my house and can chase up any problems. If a car is being driven erratically or illegally then the first thing you do is get the licence plate! Same thing needs to apply.

Page 8

Q34

Yes

Should we consider introducing geo-awareness?

Q35

What impact would geo-awareness likely have on you?

more confidence in the system

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

I think there should be a specific discussion about CHILD SAFETY ie photography/video of children. Also CRIME and PRIVACY. I have experience the child safety concerns in person, which were quickly solved, but only by luck. I have heard anecdotally that drones are used to scope domestic properties with a view of burglary of the property. I was disappointed that neither of these issues appear to be specifically mentioned, either at all, or in any great detail. I would like to know if the latter is an urban myth, or reality and how you propose that these regulations will address both of these problems, especially if you do propose to remove the requirement to get permission to fly over a house. It seems to me that the horse will have bolted if you don't specifically address this (a bit like not having them registered as soon as they appeared, perhaps you can learn from that).

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

PROACTIVELY RELEASED BY
THE MINISTRY OF TRANSPORT

#69

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, May 24, 2021 12:06:59 PM
Last Modified: Monday, May 24, 2021 12:28:21 PM
Time Spent: 00:21:21
IP Address: [REDACTED]

Page 1

Q1 Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Rhys Kelly

Q3

Email address

[REDACTED]

Q4 Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

Working for a surveying company. Daily use of UAV's around controlled airspace

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Strongly agree that all commercial operators require some sort of training. There seems to be a incorrect applicaiton of part 101 guidelines after speaking to other operators.

Q8

Yes

Do you think the proposed series of measures would help achieve the desired objectives?

Q9

Yes,

Please comment:

I agree with the idea of being able to see a live view of drone locations.

Q10

Are there any other problems and opportunities you can think of?

UAVs can be quite intimidating for the public and there is a strong negative view of them. Educating pilots to inform the public when they are flying is a great first step. Often just visibly being able to see a pilot with the controller and actively monitoring the drone location is a good measure. I will always wear a hi viz vest, which automatically lets people know that you are conducting actual work.

Q11

Yes,

Please comment:

Faster the better too

Page 4

Q12

Yes,

Please comment:

There needs to be a specific

Q13

No ,

Please comment:

Consult with pilots on this.

Q14

Yes – relax the consent provision in another way,

Please comment:

I find there is only an issue in low altitude flights due to the noise generated. Maybe a limit of say once you are at 100m AGL you can fly over private property. This gives UAV's the ability to transit over private properties with little noise generation.

Enabling Drone Integration

Q15 **Yes – relax the requirement in another way,**
Should we change the requirement to gain consent to fly above people?
Please comment:
As above, height limited

Q16 Other (please specify):
100
If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Q17 Respondent skipped this question
Are there any other major Rules changes we should consider?

Q18 **Yes,**
Are there any minor changes to the Rules that would make them easier for you to understand?
Please comment:
The application of P101 is murky. All pilots operating in a commercial sense should require a P141 operators cert. This needs to be clear

Q19
What do you think of the proposed minor Rules changes?
I think the application of a shielded operation needs to be clarified. Often pilots will pick a tall tree nearby and then say they are shielded. This is not a shielded operation

Q20 Respondent skipped this question
Are there any other changes we should consider?

Page 5

Q21 **Yes,**
Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?
Please comment:
For all commercial operators, somehow integrate this into airshare

Q22
What impact would a basic pilot qualification likely have on you?
None

Q23 **A practical examination of skill and a paper based written theory test (at a provider)**
What format should this test take?

Q24

Yes, 14 years

Should there be a minimum age for basic pilot qualification?

Q25

No,
Please comment:
One qualification for all

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27

Yes

Should we introduce the proposed drone registration system?

Q28

What impact would drone registration likely have on you?

none, some personal responsibility is needed

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Integrated through airshare

Q30

Yes, but with a different weight as the threshold

Should there be a minimum weight threshold for registering a drone?

Q31

Yes, drones flown solely indoors

Should certain drones not need to be registered (select all that apply)

Page 7

Q32

Yes

Should we introduce remote ID?

Q33

Respondent skipped this question

What impact would remote ID likely have on you?

Page 8

Q34

Yes,

Should we consider introducing geo-awareness?

Please comment:

This is built into my UAV.

Q35

Respondent skipped this question

What impact would geo-awareness likely have on you?

Page 9

Q36

Respondent skipped this question

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

PROACTIVELY RELEASED BY
THE MINISTRY OF TRANSPORT

#70

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, May 21, 2021 4:00:40 PM
Last Modified: Monday, May 24, 2021 3:04:32 PM
Time Spent: Over a day
IP Address: [REDACTED]

Page 1

Q1 Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Dave

Q3

Email address

Q4

Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

I fly model aircraft.

It seems you are classifying all model aircraft as drones now?

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

- 1) Rules updates seem sensible. No issues.
- 2) Fully supportive of basic pilot qualification and the rules as drafted. I am happy that the holder of a Part 61 qualification should not require basic pilot qualification.
- 3) I am NOT in support of this proposal as stated. While you may imagine a world where an individual may have one or two RC aircraft, enthusiasts and home builders may have many - of varying capabilities. Having to register them individually would be burdensome and costly. A number of my aircraft are constructed of foamboard - which does not have the longest of lifetimes. When aircraft is retired I can re-use all of the electronics (95% of the cost of the plane) on a different aircraft. These aircraft will nearly always weight at least several hundred grams (and thus be above the 250g exclusion). To register a new aircraft (when replacing an existing one) would add extra cost to what is already a costly endeavour (for those of us who do this on a tight budget). I do NOT believe that any requirement to register individual aircraft will add any safety to model aircraft operations - which are already very very safe. It does not give the operator of a model aircraft any new skills, it does not make that model aircraft more reliable, it will not stop people busting airspace. The only thing it will do is create a potential audit trail after a crash. I cannot see this type of rule doing anything but driving high levels of non-compliance amongst the model aviation community. Not all of us fly at MFNZ flying sites. Those who purposely chose to break the rules (e.g. those that chose to fly in aircraft approach paths etc) will never register their aircraft - that would be like robbing a bank and using your own car for the getaway. I would like to suggest two alternative options that I think would be better received:
 - a) Registration requirement for aircraft based on the privileges someone is wanting to exercise - e.g. a standard model aircraft would not require registration, but the following would:
 - Part 102 operations
 - Commercial operations
 - BVLOS
 - Operations higher than 400'
 - Flight in Controlled airspace
 - etc
 - b) Registrations of pilots and not their aircraft (except as in (a) above). Implement a similar system to what they had in the USA several years ago.
- 4) Remote ID. I do NOT support the widespread blanket requirement for RID. This may be a foundational step forward for integration of RPAS into the 400+ airspace (albeit fundamentally flawed as it does not address avoiding collisions with manned aircraft) it is simply completely over burdensome for the backyard and park flyer who wish to stay purely within the 400' ceiling and confines of the area in which they are flying - something that model flyers have been doing for 100 years very safely. It means every model needing now to GPS and flight computer enabled - with the appropriate RID module. This is a large increase in cost for many model flyers and an increase in weight which will be a major issue for many RC classes (e.g. gliders). All so the model flyers can continue to do what they have been safely doing for 100+ years. Your information incorrectly asserts that manufacturers such as DJI already are Remote ID equipped. That is completely wrong. Some of their later models may be able to become Remote ID enabled with a firmware update - but that is not the same thing. You are portraying it as if this is a mature technology - when it is not even fully defined! The information goes on to say that it can detect other aircraft (i.e. ADSB-in) - again not the same thing as broadcasting Remote ID. These kind of capabilities may be easy to add on for camera drones like the ones DJI sells as they already come with GPS and flight computers etc. These are not at all standard on small model aircraft which only require an RC receiver, a battery and several servos. The rules need to be written in such as a way that to get additional rights/benefits you need to add capabilities such as Remote ID to your craft - not that to fly within the legal safe areas we already fly in we now need to spend hundreds of dollars per aircraft to give them a capability of dubious (really no) value to the operator. Again this type of requirement will drive non-compliance.
- 5) No issues if the CAA wants to develop applications and make available more information to hobby fliers about the airspace and NOTAMs etc. That would be wonderful. So long as that does not extend into a mandatory integration of Geoawareness/geofencing etc into the aircraft itself. No issue if vendors (such as DJI) want to do that themselves, but the imposition of making this mandatory for all aircraft is a bridge too far (again drives huge extra cost of GPS/flight computer etc for each aircraft).

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

I don't know,

Please comment::

See my full list of comments above. I think the proposed rules updates and pilot qualifications will do much of what the CAA wants. Registration and Remote ID I do NOT think will enhance safety at all. Those who want to knowingly break the rules will not register or equip their aircraft with Remote ID. Remote ID will not help with collisions with full sized aircraft as it is not using ADSB technology and instead using technology that no manned aircraft is equipped to detect and avoid. The only reason the FAA weren't going down the ADSB path was that they were worried about too many craft flooding the ADSB frequencies. And the only reason that there would be too many was they were going to legislate that all RPAS had RID. So you can see how this becomes self defeating. They are going down the wrong path. RID becomes even more onerous when you have to have network connectivity as well as broadcast capability. Yes the FAA have paused that element, but they specifically comment they wish to revisit this in future years. This kind of thing should only be considered for aircraft wanting to co-exist with manned aircraft (i.e. those wanting to fly at 400' plus).

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

No,

Please comment:

See above.

Q10

Are there any other problems and opportunities you can think of?

I've said enough already.

Q11

Do you agree with the proposed order of implementation of the measures?

No,

Please comment:

I do not believe registration of all RPAS should be implemented at this point in time. I think the CAA should implement the first two - and perhaps even registration of pilots (which is really just a registry of those who do the basic pilot qualification) and study the impacts of those initiatives before deciding on future steps.

Page 4

Q12

Should drones have their own standalone Rule Part?

Yes

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

Yes,

Please comment:

In this case the safety concern is of course collisions. But aircraft flight paths largely follow the takeoff and landing/approach paths, so the amount of risk 1km away from an airfield on the non-traffic side of the traffic pattern is absurdly low. Also restricting flight within 4km of a heliport which gets used only once a week (if that) I think is overly restrictive. I'd love a set of rules that say that I can operate much closer to an aerodrome (uncontrolled in my case) where I have a radio receiver tuned to the operating frequency of that aerodrome and am keeping a good listen out for incoming traffic.

Q14

Should we change the requirement to gain consent to fly above property?

Yes – use 'safe distances' as an alternative,

Please comment:

This rule seems to have been brought into address privacy - but we already have rules around privacy. Furthermore I think many of the concerns here are a lack of understanding by the general public of what can be seen from the air. Most people on the ground a tiny speck in the lens of a 'drone'. I think any property owner should be able to revoke the right of any individual to fly over their property (whether by verbal notification or by signage).

Q15

Should we change the requirement to gain consent to fly above people?

Yes – use 'safe distances' as an alternative,

Please comment:

I think you should have to have consent to be able to fly over any person. But so long as you're keeping away from them, then I think a pilot should be within the rules. As an RC flier sometimes it is difficult to manage where a person or group decides to walk under your flight path - so you can inadvertently fly over people (at altitude). I.e. when you're eyes are on the sky and your aircraft you may not necessarily notice someone in your peripheral vision that walks within the bounds of your flight circuit until too late. I would like to be free from prosecution for type of instance where it is non-deliberate and the "Karen" has chosen to walk under my flight path.

Q16

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

30 metres

Q17

Are there any other major Rules changes we should consider?

No

Q18

No

Are there any minor changes to the Rules that would make them easier for you to understand?

Q19

What do you think of the proposed minor Rules changes?

I think I've said everything in the last few pages ...

Q20

Are there any other changes we should consider?

See my feedback prior.

Page 5

Q21

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Yes, with changes ,

Please comment:

Personally I believe the 25kg limit is way too high. A 25kg aircraft (or even a 10kg aircraft) could be extremely dangerous to someone on the ground if it hit them. It does not make sense to me how we have the same rules for everything from 250g to 25kg. If we are serious about risk-based rules, then I think there is definitely a category between that 250g and 25kg. I'm not sure what the number is - could be 2.5kg, 5kg or 10kg, but it feels like you have exponentially higher safety concern as the weight increases. I think there should be additional requirements to fly something over 5kg for example. It may not fall into the Basic Pilot Qualification category - it might be a more advanced qualification that requires a flight test/practical competency test.

Q22

What impact would a basic pilot qualification likely have on you?

None - I already hold a CPL.

It will mean that my kids will need to sit the basic pilot qualification to fly unsupervised, but I would consider this a good thing.

Q23

Electronic/online theory test

What format should this test take?

Q24

No

Should there be a minimum age for basic pilot qualification?

Q25

Yes

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Is there any other special authorisations you would like to see?

As above, I'd love to see something between 250g and 25kg ...

I mean your data might show that this is just not an issue, and that's fine if that is the case. I just know that as a pilot I feel a weight of responsibility not to hurt or injure anyone and the fact that anyone can just fly a 24kg RC plane with no additional qualification than to fly a 250g toy makes me uneasy....

Page 6

Q27

Should we introduce the proposed drone registration system?

No,

Please comment:

See my comments from the first page. This requirement is too onerous and likely to result in high levels of non-compliance, whilst doing nothing to actually improve safety. I'd much rather that the pilots themselves be registered and the CAA sends out educational emails etc (like they do the with the Flight magazine) to those pilots.... No issue with large/commercial drones etc needing registration - if it grants them further permissions. I.e. permissions and registration should be tied together.

Q28

Respondent skipped this question

What impact would drone registration likely have on you?

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

I do not like the idea of a publicly available drone register in the slightest.

We do not have a register for cars that is publicly available - and cars kill a lot of people every year.

Q30

Should there be a minimum weight threshold for registering a drone?

Yes, but with a different weight as the threshold ,

Please comment:

Only those who want more privileges (e.g. BVLOS) should require registration.

Q31

Should certain drones not need to be registered (select all that apply)

Yes, drones flown solely indoors,

Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)

,

Yes, others (please specify below),

Please comment:

Recreationally flown model aircraft. Yes I'm aware that this will mean that when "Johnny" buys his DJI Mavic Air 2 and flies into the Auckland ILS path you'd not be able to look up his drone. However you'd never be able to tell the drone from another DJI Mavic Air 2 when sighted. So all the register would serve to do would be to create a suspect list for the police to go about harassing in the event of an incident - based solely on their inclusion in this list as a law abiding citizen - not because of any evidence tying them to the crime of unauthorised flight etc.

Page 7

Q32

Should we introduce remote ID?

Yes,

Please comment:

But only for RPAS that are wanting more privileges. And I have no confidence that the route that the USA and EU etc are going down is the right path. This seems more of a prosecution tool rather than a safety tool.

Q33

What impact would remote ID likely have on you?

Respondent skipped this question

Page 8

Q34

Should we consider introducing geo-awareness?

Yes,

Please comment:

So long as it is restricted to providing information, and not requiring additional equipment aboard every RC plane.

Q35

What impact would geo-awareness likely have on you?

Easy access to NOTAMs would be very nice to have!

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

No

Q37

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

PROACTIVELY RELEASED BY
THE MINISTRY OF TRANSPORT

#71

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, May 24, 2021 9:18:49 PM
Last Modified: Monday, May 24, 2021 9:59:13 PM
Time Spent: 00:40:23
IP Address: [REDACTED]

Page 1

Q1 Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Jonny Gilks

Q3

Email address

[REDACTED]

Q4

Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

Photography. Part recreational - part work, location scouting for the screen industry

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

PROACTIVELY RELEASED BY THE MINISTRY OF TRANSPORT

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

I think they are on the right track. I'm not sure how the remote ID would work. My drone is too small (albeit expensive) to carry any additional weight eg an ID mechanism. Which might make my drone obsolete.

Q8

I don't know

Do you think the proposed series of measures would help achieve the desired objectives?

Q9

Yes

Do you think the proposed series of measures would address the problems and opportunities identified?

Q10

Are there any other problems and opportunities you can think of?

There are scenarios where needing permission to fly over private property is too prohibitive. Above rural/farmland would be ideal flying space.

Q11

Yes

Do you agree with the proposed order of implementation of the measures?

Page 4

Q12

Yes,

Should drones have their own standalone Rule Part?

Please comment:

They are different to rockets, kites etc and more common.

Q13

I don't know,

Should we review the four-kilometre minimum flight distance from aerodromes?

Please comment:

How about can fly closer to the aerodrome eg 2 kms at half the height ?

Q14

Yes – use 'safe distances' as an alternative,

Should we change the requirement to gain consent to fly above property?

Please comment:

It is too prohibitive currently, needs more balance.

Q15

Yes – use 'safe distances' as an alternative

Should we change the requirement to gain consent to fly above people?

Q16

10 metres

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Q17

Respondent skipped this question

Are there any other major Rules changes we should consider?

Q18

I don't know

Are there any minor changes to the Rules that would make them easier for you to understand?

Q19

Respondent skipped this question

What do you think of the proposed minor Rules changes?

Q20

Are there any other changes we should consider?

There is a post on reddit by an nz drone user. He explains all the rules in nz from his experience, he does the best job of communicating the rules.. better communication than the CAA.

https://www.reddit.com/r/newzealand/comments/7ljcn2/a_guide_to_flying_your_drone_in_new_zealand_caa/

Page 5

Q21

Yes

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Q22

What impact would a basic pilot qualification likely have on you?

I guess gaining some more responsibility

Q23

Electronic/online theory test

What format should this test take?

Q24

Yes, 16 years

Should there be a minimum age for basic pilot qualification?

Q25

I don't know

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27

I don't know

Should we introduce the proposed drone registration system?

Q28

What impact would drone registration likely have on you?

If my drone became obsolete I would not get another, it was already a big investment

Q29

Respondent skipped this question

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Q30

Yes, but with a different weight as the threshold ,

Should there be a minimum weight threshold for registering a drone?

Please comment:
750 grams

Q31

Yes, drones flown solely indoors

Should certain drones not need to be registered (select all that apply)

Page 7

Q32

I don't know

Should we introduce remote ID?

Q33

Respondent skipped this question

What impact would remote ID likely have on you?

Page 8

Q34

Yes

Should we consider introducing geo-awareness?

Q35

What impact would geo-awareness likely have on you?

Easier too fly. Informative, useful.

Page 9

Q36

Respondent skipped this question

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

PROACTIVELY RELEASED BY
THE MINISTRY OF TRANSPORT

#72

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, May 25, 2021 8:49:53 AM
Last Modified: Tuesday, May 25, 2021 9:16:26 AM
Time Spent: 00:26:33
IP Address: [REDACTED]

Page 1

Q1 **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

James Perry

Q3

Email address

[REDACTED]

Q4

Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

Chief Pilot at Shotover Media, 102 Certified Operator. Shotover Media is a commercial film production company.

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Totally on board. I've said for a number of years that all UAVs should have to be registered to instill confidence with the public. A similar approach to road vehicles. A license and a registered vehicle seems sensible. On the other side of things, some work to improve government and land authorities' understanding and approach towards regulated drone use is required. DOC for example still treat UAVs as helicopters, making things much more difficult than they need to be. Education within these authorities around the benefits that UAVs offer would also be highly beneficial.

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

Yes, with changes ,

Please comment::

It's a very good start but will obviously be an evolving process.

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

Yes, with changes ,

Please comment:

As above

Q10

Are there any other problems and opportunities you can think of?

Specified in point 1

Q11

Do you agree with the proposed order of implementation of the measures?

Yes

Page 4

Q12

Should drones have their own standalone Rule Part?

Yes

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

No ,

Please comment:

I wouldn't recommend it unless it's an experienced operator with a good understanding of aerodrome flight paths and a good relationship with the controller.

Q14

Should we change the requirement to gain consent to fly above property?

Yes – relax the consent provision in another way,

Please comment:

There'll need to be a minimum altitude for this relaxation otherwise you'll run into privacy issues. Flying 200ft above a property when the UAV doesn't make much noise from the ground and can't be construed as invading privacy (much the same as a helicopter) I don't think should require consent, providing you're not filming the property. Flying low over the property will disturb the occupants and invade their privacy so should require consent or at least prior notification if an experienced and certified operator.

Q15

Should we change the requirement to gain consent to fly above people?

No – keep the existing requirement,

Please comment:

I think the existing requirement is sensible

Q16

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

30 metres

Q17

Are there any other major Rules changes we should consider?

Respondent skipped this question

Q18

Are there any minor changes to the Rules that would make them easier for you to understand?

Respondent skipped this question

Q19

What do you think of the proposed minor Rules changes?

Respondent skipped this question

Q20

Are there any other changes we should consider?

Respondent skipped this question

Page 5

Q21

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Yes, with changes ,

Please comment:

It should be more like a driving test for a road vehicle

Q22

What impact would a basic pilot qualification likely have on you?

It would simply introduce greater confidence with the public, making initial conversations with the public a little easier.

Q23

What format should this test take?

A practical examination of skill and a paper based written theory test (at a provider)

Q24

Should there be a minimum age for basic pilot qualification?

Yes, 16 years

Q25

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

I don't know

Q26

Is there any other special authorisations you would like to see?

Respondent skipped this question

Page 6

Q27

Should we introduce the proposed drone registration system?

Yes

Q28

What impact would drone registration likely have on you?

Improved confidence in the industry. As a 102 operator, we often suffer from the negative generalization created by irresponsible drone users. Registration would hold users accountable and increase public confidence.

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Respondent skipped this question

Q30

Should there be a minimum weight threshold for registering a drone?

Yes, with 250 grams as the weight threshold

Enabling Drone Integration

Q31

Should certain drones not need to be registered (select all that apply)

Yes, others (please specify below),

Please comment:

Same as motor vehicles. You should be able to "take it off the road" when not being used in public.

Page 7

Q32

Should we introduce remote ID?

I don't know,

Please comment:

The data would have to be secure, not publicly available, and not misused. There's IP in UAV flight paths. Film location scouts for example.

Q33

What impact would remote ID likely have on you?

Not immediately sure

Page 8

Q34

Should we consider introducing geo-awareness?

Yes,

Please comment:

DJI have a similar setup, which is good, although it doesn't cover many areas, such as private aerodromes and parachute areas etc.

Q35

What impact would geo-awareness likely have on you?

Not much directly. It would help in preparation when I'm operating in an area I'm unfamiliar with. Would help less experienced operators more and increase confidence.

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Not currently

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

#73

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, May 25, 2021 4:13:51 PM
Last Modified: Tuesday, May 25, 2021 5:35:18 PM
Time Spent: 01:21:27
IP Address: [REDACTED]

Page 1

Q1 Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Stu Jackson

Q3

Email address

[REDACTED]

Q4

Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

I'm a commercial photographer, mainly using drones for shooting either buildings or rural agricultural workings

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

In general I think they are heading in the right direction

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

Yes, with changes ,

Please comment::

Under the current system, the 102 seems more about general compliance (safety plans etc) than drone operation. How can a COMPANY like Fulton Hogan be the holder of a part 102 when I personally know that a lot of their staff operate drones in their employ for FH and they have no idea of the rules ! Shouldn't EVERY employee that needs a 102 have to get a license specific to that person ?

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

Yes, with changes ,

Please comment:

As above

Q10

Are there any other problems and opportunities you can think of?

I think the cutoff weight limits are far too high. a 25kg drone can easily kill someone at speed. What about making a new cutoff of around 5kg which puts most recreational drone in that class. Keep the current classes but add a new weight cutoff with less onerous rules than a 20kg drone for example

Q11

Do you agree with the proposed order of implementation of the measures?

Yes

Page 4

Q12

Should drones have their own standalone Rule Part?

Yes

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

Yes,

Please comment:

Most cities have a heliport at their hospital therefore potentially stopping someone flying a drone in their back yard (Yes, I understand the rules re flying near to a building etc)

Q14

Should we change the requirement to gain consent to fly above property?

No – keep the existing consent provision,

Please comment:

In rural areas apparently the crims are using drones to scope properties so maybe keep this rule

Q15

Should we change the requirement to gain consent to fly above people?

Yes – relax the requirement in another way,

Please comment:

I fly under part 101 but have flown over 1000kms and 120 hrs of droning so consider myself fairly competent in the control of my machine. Should I therefore not be able to do flights that you wouldn't expect a complete novice to do, as long as at appropriate heights and speeds etc

Q16

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Other (please specify):

At least 50 metres

Q17

Are there any other major Rules changes we should consider?

Maybe some possibility of flying soon after sunset as long as at very low levels etc...

Q18

Are there any minor changes to the Rules that would make them easier for you to understand?

Respondent skipped this question

Q19

What do you think of the proposed minor Rules changes?

Respondent skipped this question

Q20

Are there any other changes we should consider?

Respondent skipped this question

Page 5

Q21

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Yes, with changes ,

Please comment:

Lower the weight limit to 5 kgs (or somewhere around there)

Q22

What impact would a basic pilot qualification likely have on you?

None, I should easily qualify

Q23 **A practical examination of skill and a paper based written theory test (at a provider)**
 What format should this test take?

Q24 **Yes, 16 years**
 Should there be a minimum age for basic pilot qualification?

Q25 **Yes**
 Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26 **Respondent skipped this question**
 Is there any other special authorisations you would like to see?

Page 6

Q27 **Yes**
 Should we introduce the proposed drone registration system?

Q28
 What impact would drone registration likely have on you?
 None, my latest drone (a week old) has the ability to transmit an ID number

Q29 **Respondent skipped this question**
 What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Q30 **Yes, but with a different weight as the threshold**
 Should there be a minimum weight threshold for registering a drone?

Q31 **Yes, drones flown solely indoors, Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)**
 Should certain drones not need to be registered (select all that apply)

Page 7

Q32

Should we introduce remote ID?

Yes,

Please comment:

I'm happy for anyone to know that I was operating the drone they are seeing / hearing

Q33

What impact would remote ID likely have on you?

None

Page 8

Q34

Should we consider introducing geo-awareness?

Yes,

Please comment:

As long as there are workarounds. I am unable to use a drone at even 5m height under an airport runway flight path 3kns from the airport. I wanted to drone some hay baling happening. More chance of damage from hitting the tractor than the drone ! :)

Q35

What impact would geo-awareness likely have on you?

See above

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Respondent skipped this question

Q37

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

Respondent skipped this question

#74

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, May 26, 2021 11:21:04 AM
Last Modified: Wednesday, May 26, 2021 11:44:37 AM
Time Spent: 00:23:32
IP Address: [REDACTED]

Page 1

Q1 **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Saskia

Q3

Email address

[REDACTED]

Q4

Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

Home owner/social service sector worker. If we sell house we will get a drone in.

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

PROACTIVELY RELEASED BY
THE MINISTRY OF TRANSPORT

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Regular checks on data collected by drones. To stop people breaching others privacy and or causing harm to others. Are there also rules regarding not hunting from drones of birds, animals etc. As this could become a problem. Have the implications of those with mental health or criminal intent concerns utilising drones to stalk or cause abuse to others, been considered?

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

Yes, with changes ,

Please comment::

More focus on the privacy act.

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

I don't know

Q10

Are there any other problems and opportunities you can think of?

Drone use and regulation. Great for technical advancement of agriculture and some other industries. Might just at times come at the price of privacy breaches, noise issues and environmental waste increase.

Q11

Do you agree with the proposed order of implementation of the measures?

Yes,

Please comment:

Work needs to be completed before they become extremely popular. Like many other technical advances that start of with all the best intentions there are many harms that come with them. To the natural environment, person wellness and economic disparity. For example plastic single use items.

Page 4

Q12

Should drones have their own standalone Rule Part?

No ,

Please comment:

Do not allow drones over private property unless at higher altitude that cannot capture footage. This may need to link into aeroplane tracking and navigation.

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

Yes

Q14

Should we change the requirement to gain consent to fly above property?

Yes – relax the consent provision in another way,

Please comment:

Always gain consent if within sight of drones camera

Enabling Drone Integration

Q15 Should we change the requirement to gain consent to fly above people?	Yes – relax the requirement in another way, Please comment: They need to be at a distance that means they are not capturing footage of you.
Q16 If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?	Respondent skipped this question
Q17 Are there any other major Rules changes we should consider? Not capturing people in footage without consent	
Q18 Are there any minor changes to the Rules that would make them easier for you to understand?	I don't know
Q19 What do you think of the proposed minor Rules changes?	Respondent skipped this question
Q20 Are there any other changes we should consider?	Respondent skipped this question
Page 5	
Q21 Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?	Yes
Q22 What impact would a basic pilot qualification likely have on you? The cost of getting a drone in might be higher	
Q23 What format should this test take?	A practical examination of skill and a paper based written theory test (at a provider)
Q24 Should there be a minimum age for basic pilot qualification?	Yes, 16 years

Q25

I don't know

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Is there any other special authorisations you would like to see?

Police check

Page 6

Q27

Yes

Should we introduce the proposed drone registration system?

Q28

Respondent skipped this question

What impact would drone registration likely have on you?

Q29

Respondent skipped this question

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Q30

I don't know

Should there be a minimum weight threshold for registering a drone?

Q31

Respondent skipped this question

Should certain drones not need to be registered (select all that apply)

Page 7

Q32

Yes

Should we introduce remote ID?

Q33

Respondent skipped this question

What impact would remote ID likely have on you?

Page 8

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Q34

Respondent skipped this question

Should we consider introducing geo-awareness?

Q35

Respondent skipped this question

What impact would geo-awareness likely have on you?

Page 9

Q36

Respondent skipped this question

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

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#75

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, May 28, 2021 11:17:45 AM
Last Modified: Friday, May 28, 2021 12:31:57 PM
Time Spent: 01:14:11
IP Address: [REDACTED]

Page 1

Q1 Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Justin Walters

Q3

Email address

[REDACTED]

Q4

Who are you submitting on behalf of?

Local government,

If you are not submitting as an individual, please specify who you represent.:

Whanganui District Council

Q5

Briefly tell us your interest in drones

- Regulator of activities in public spaces - Bylaws
- Roads, Parks, Reserves and Open Spaces - RCA and Land Owner
- Whanganui Airport - Joint owner and Operator

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Broadly supportive but need to avoid unintended consequences including matters such as:

- Consideration for uncontrol airports and approvals where no one is present to review requests
- Differentiating between en route overflight vs flying flying within a public space or park -
- Allowing TA and RC the ability to set drone exclusion areas (not overflight at minimum prescribed heights) for amenity reasons similar to the DOC through bylaws.
- TA and RC rules included within geo-awareness platform for pilots.

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

Yes, with changes ,

Please comment::

Method of implementation will need to be done so as not

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

Yes, with changes

Q10

Are there any other problems and opportunities you can think of?

TA and RC rules included within geo-awareness platform for pilots to aid compliance.

Q11

Do you agree with the proposed order of implementation of the measures?

Yes

Page 4

Q12

Should drones have their own standalone Rule Part?

Yes,

Please comment:

Provided that broader UAV definition is applied

Q13

Should we review the four kilometre minimum flight distance from aerodromes?

Yes,

Please comment:

In consultation with uncontrolled airports and heliports (including hospitals). Within Whanganui the hospital has delegated approvals for applications to fly within 4km to Whanganui airport as they simply don't have the capacity/expertise to do it.

Q14

Should we change the requirement to gain consent to fly above property?

Yes – use 'safe distances' as an alternative,

Please comment:

Differentiation needed between en route overflight vs flying flying within a public space or park

Q15

Should we change the requirement to gain consent to fly above people?

Yes – relax the requirement in another way,

Please comment:

Need to include a duty of care to avoid injury or loss of property.

Q16

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Respondent skipped this question

Q17

Are there any other major Rules changes we should consider?

Need to allow Councils the ability to set drone exclusion areas (not overflight at minimum prescribed heights) for amenity reasons similar to the DOC through bylaws for amenity reasons. Without an explicit carveout, changes to CAA regulations would trump any bylaws/controls Council may make regarding drones and the use of space.

Q18

Are there any minor changes to the Rules that would make them easier for you to understand?

Respondent skipped this question

Q19

What do you think of the proposed minor Rules changes?

Respondent skipped this question

Q20

Are there any other changes we should consider?

Respondent skipped this question

Page 5

Q21

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Yes

Q22

What impact would a basic pilot qualification likely have on you?

Respondent skipped this question

Q23

What format should this test take?

Electronic/online theory test

Q24

Yes, 14 years

Should there be a minimum age for basic pilot qualification?

Q25

Respondent skipped this question

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27

Yes,

Should we introduce the proposed drone registration system?

Please comment:

Consideration should be given to how to manage scratch built UAV that might have a short lifespan but should still be able to tracked.

Q28

Respondent skipped this question

What impact would drone registration likely have on you?

Q29

Respondent skipped this question

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Q30

Yes, with 250 grams as the weight threshold

Should there be a minimum weight threshold for registering a drone?

Q31

Yes, drones flown solely indoors,

Should certain drones not need to be registered (select all that apply)

Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)

Page 7

Enabling Drone Integration

Q32

Should we introduce remote ID?

Yes,

Please comment:

Authentication may be problematic for 'basic' RC UAVs and options will need to be available for after market upgrade to allow pilots to remain compliant with regulations.

Q33

What impact would remote ID likely have on you?

Respondent skipped this question

Page 8

Q34

Should we consider introducing geo-awareness?

Yes,

Please comment:

TA and RC rules included within geo-awareness platform for pilots to facilitate compliance.

Q35

What impact would geo-awareness likely have on you?

Respondent skipped this question

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Bylaws - Need to allow Councils the ability to set drone exclusion areas (not overflight at minimum prescribed heights) for amenity reasons similar to the DOC through bylaws for amenity or wildlife protection reasons. There may also be other valid reasons for restricting the use of drones within public space due to other activities occurring within a space.

Without an explicit carveout, changes to CAA regulations would trump any bylaws/controls Council may make regarding drones and the use of space.

To date a number of councils have been using their powers as landowner to control drones.

Q37

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

Respondent skipped this question

#76

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Sunday, May 30, 2021 3:01:41 PM
Last Modified: Sunday, May 30, 2021 4:28:49 PM
Time Spent: 01:27:08
IP Address: [REDACTED]

Page 1

Q1 Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Bradley R. Smith

Q3

Email address

[REDACTED]

Q4 Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

I fly model aircraft, planes and helicopters. I don't own any drones that aren't model aircraft. I don't fly FPV. I do have some knowledge of photography drones and FPV drones.

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

I don't see why model aircraft, when flown in the traditional manner, should be lumped in with drones that are operated via FPV or with an autopilot. The need to stay within clear line of sight of the pilot is built into model aircraft operation. This also greatly limits how far it can be flown from where the pilot is standing. The airspace over New Zealand is very large and model aircraft only need a very small part of it. I would ask that you leave model aircraft rules as they are, the risk to the public there is extremely small and well understood.

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

Yes, with changes ,

Please comment::

Integrating drones into the civil aviation system is going to take some time and drone technology is rapidly changing. The greatest risk is loss of life from an accident involving a manned aircraft. To reduce that largest risk I think it's reasonable to add more separation between manned and unmanned aircraft during the transition period. I would propose a 1000 foot AGL ceiling over urban areas. Manned aircraft would not be allowed beneath this ceiling, except when taking off or landing. There is little justification for manned aircraft to be operating in that space anyway. Having that airspace below 1000 ft exclusively for drones would be a boon for innovative companies developing new drones and new applications of drone technology.

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

Yes,

Please comment:

A basic qualification for Part 101 drone pilots seems like a necessity.

Q10

Are there any other problems and opportunities you can think of?

Respondent skipped this question

Q11

Do you agree with the proposed order of implementation of the measures?

Yes

Page 4

Q12

Should drones have their own standalone Rule Part?

I don't know

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

I don't know

Q14

Should we change the requirement to gain consent to fly above property?

Yes – use 'safe distances' as an alternative,

Please comment:

30m in a straight line seems like a reasonable safe distance where no consent has been given.

Q15

Should we change the requirement to gain consent to fly above people?

Yes – use 'safe distances' as an alternative,

Please comment:

30m in a straight line seems like a reasonable safe distance where no consent has been given.

Q16

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

30 metres

Q17

Are there any other major Rules changes we should consider?

Respondent skipped this question

Q18

Are there any minor changes to the Rules that would make them easier for you to understand?

No

Q19

What do you think of the proposed minor Rules changes?

Respondent skipped this question

Q20

Are there any other changes we should consider?

Respondent skipped this question

Page 5

Q21

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Yes,

Please comment:

A basic qualification for Part 101 drone pilots seems like a necessity. There are several things a pilot needs to know to operate a drone safely. An online theory test should be sufficient. As enforcement of drone rules will be very difficult the online test should not be too hard or it will discourage compliance. Emphasis should be on those facts that will have the biggest impact on public safety. Model aircraft pilots should not need to take this test if they have a Wings qualification through MFNZ. That system took a lot of work to create and is still fit for purpose.

Q22

What impact would a basic pilot qualification likely have on you?

Hopefully none. I have a Wings badge from MFNZ. I already have the knowledge I need to operate model aircraft safely.

Q23

Electronic/online theory test

What format should this test take?

Q24

Respondent skipped this question

Should there be a minimum age for basic pilot qualification?

Q25

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Yes,

Please comment:

Model aircraft pilots should not need to take this test if they have a Wings qualification through MFNZ. That system took a lot of work to create and is still fit for purpose.

Q26

Is there any other special authorisations you would like to see?

Respondent skipped this question

Page 6

Q27

Should we introduce the proposed drone registration system?

Yes, with changes,

Please comment:

I don't see the point in registering individual aircraft. That adds a much heavier burden with no benefit. The point is identify the pilot so they can be held accountable. Pilots should be held accountable for safe flying. It's quite sufficient for the pilot to be registered and their registration number can be put on each drone. If a company or club owns an aircraft then that company or club can have a registration.

Q28

What impact would drone registration likely have on you?

I have ten model aircraft. Some of them rarely fly. It would be a substantial cost if each one had to be registered separately. That would be a significant disincentive to continue in the hobby.

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

If a digital remote ID system is created I hope it will not disclose personal information like my name or current location. It should be sufficient for the remote ID system to only reveal the registration number to members of the public. As is the case with car registrations.

Q30 **Yes, with 250 grams as the weight threshold**

Should there be a minimum weight threshold for registering a drone?

Q31 **Yes, drones flown solely indoors, Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)**

Should certain drones not need to be registered (select all that apply)

Page 7

Q32 **I don't know,**
Please comment:
You don't need Remote ID to identify the pilot of a model aircraft. If you can see the aircraft then the pilot will be somewhere nearby in line of sight to the aircraft.

Should we introduce remote ID?

Q33 **I don't know,**
Please comment:
I have ten model aircraft that don't have remote ID now. If I have to add it to keep flying then that will have a cost in money and time.
I expect to still have most of these aircraft ten years from now. I owned two of them ten years ago.

What impact would remote ID likely have on you?

Page 8

Q34 **I don't know,**
Please comment:
It sounds cool but it all depends on how well it is implemented.

Should we consider introducing geo-awareness?

Q35 **I don't know,**
Please comment:
Hopefully none. I fly model aircraft.

What impact would geo-awareness likely have on you?

Hopefully none. I fly model aircraft.

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

The air space over New Zealand should be for the benefit of the average New Zealander. It shouldn't be put out of reach just when it has become more accessible then ever.

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

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THE MINISTRY OF TRANSPORT

#77

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Sunday, May 30, 2021 9:44:16 AM
Last Modified: Sunday, May 30, 2021 8:53:15 PM
Time Spent: 11:08:58
IP Address: [REDACTED]

Page 1

Q1 Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Peter Cleveland

Q3

Email address

Q4

Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

I have been an active researcher in drone technology since 2015. I am also an active amateur RC model flier.

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

The proposed series of measures are commendable and agree with the NZ Government approach of viewing drones as a "cultural technology". However, I am surprised by the distinct departure from the World Economic forum Advanced Drone Operations Toolkit and its premise of performance-based regulation (PBR) with regard to CAA part 101 and emerging research into the area of drone technology. "When PBR is applied to the field of unmanned aviation, it enables the expansion, piloting and live-testing of new technologies through a holistic approach to risk management and redefines what operations are possible. By focusing exclusively on a strict certification approach to aviation technologies or waiting for other CAAs or international bodies to develop regulations that permit advanced drone operations, nations miss out on life-saving benefits that drones can provide. Social and economic demands that could be fulfilled through advanced drone applications are being left unfulfilled as governments struggle to move forward with flexible yet safe regulations." This risk assessed approach has generated use cases and data that perhaps could be considered in the impending rules update as it allows scalable academic development that sit alongside and often inform purely commercial interest and regulation.

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Q8

Do you think the proposed series of measures would help achieve the desired objectives?

Yes, with changes ,

Please comment::

The current compliance challenges faced by the NZ regulator, CAA , speaks volumes about its ability to generate durable and digestible policy which has standards that are expediently achievable by the ordinary citizen drone pilot, as opposed to widespread rogue operators and general anti-systemic practices by amateurs being the norm. I note that there is a significant downward trend in the number of incursions into controlled airspace, as evidenced in Table 3 page 18 of the discussion document which suggests a maturing of the amateur drone pilot's understanding of airspace and indicates that there is widespread compliance from drone pilot's and that the current regulations and micro-marketing campaign carried out by CAA are having a desirable impact. Specifically the understanding of what a "shielded operation" is and how to safely carry it out. This is an innovative feature of NZ's airspace management and, in my opinion, should be enhanced. A legacy of ineffective enforcement of regulations and failed prosecutions by CAA is well documented in the print media and on social media platforms. This is across the spectrum of manned and unmanned flight operations. Two recent examples stand out. 1. The failed prosecution in Nov 13 2020 of Mountain Helicopters Fox Glacier and Alpine Guides Fox Glacier. In which "The judge said he found it difficult to see why both companies should be tainted by the prospect of a conviction. There was no suggestion they were "rogue operators". At the reported cost of over \$94,000 to the NZ taxpayer 2. The farcical exposition of CAA's competence and potency as a regulator in a series of Youtube videos posted by a senior citizen suffering from Parkinson's' disease armed with a Youtube channel (Xjet) and toy drone operated in a Tokoroa back yard. I would suggest that there is a lot of room for professional development at CAA which sits well outside the premise that Enforcement can be difficult due to lack of compliance and advancing technology. Perhaps upgrading regulator competency would be a timely measure to undertake in tandem with the proposed changes to NZ airspace regulation.

PROACTIVELY RELEASED
THE MINISTRY OF TRANSPORT

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

Yes,

Please comment:

The need for testing and licensing of drone pilots is obvious and would be a very welcome development for organizations such as universities that have Health Safety and Well-being obligations to their stakeholders as a primary concern. It is important to note that the vast majority of drone operations carried out by tertiary organizations are low risk, non-commercial, and are carried out by students (i.e not employees) focused on knowledge generation. It would be detrimental to innovation, education, and research if tightly coupled rules, costs, and compliance associated with registration and Identification made it impossible to support students and staff in their endeavors. The proposed series of measures is very light on detail as to the costs of drone registration and compliance. Moving forward it would be essential for this to be an area of collaboration or perhaps dispensation to allow for forward planning of opex and capex in these times of severe fiscal constraint.

Q10

Are there any other problems and opportunities you can think of?

The proposed series of regulatory measures seems determined to create a scenario of separate development between amateur and commercial drone operations. The costs associated with gaining CAA part 102 certification are prohibitive. Also, the quality assurance required to maintain this status is not always feasible in an academic environment.

Perhaps an opportunity exists for an in-between space for educational organizations to be a bridge between these two distinct states of being (Commercial / Amateur) that is beneficial to NZ Research, Innovation, STEM, and Future Environments. The current providers of training in the commercial space do not have these aims in their purview. It would be innovative to allow an educational space that guides airspace users from an Amateur, rules-based mode into a risk-assessed mode. This would not only significantly grow the potential base of trained competent operators available to industry, but also align with the stated aim of building complementary blocks in a sustainable way in a step change model that could link NZ educational curriculum seamlessly with the strategic direction of the Transport Outcomes Framework.

Q11

Do you agree with the proposed order of implementation of the measures?

Yes,

Please comment:

The proposed methodology and timeline are sensible.

Q12

Should drones have their own standalone Rule Part?

No ,

Please comment:

The current stance of not differentiating between recreational and commercial operations is working well. What is missing from the current framework and notably absent from the proposed changes is an actual risk assessment by the New Zealand government focused on all users of airspace (this includes manned aviation) and takes into account the actual frequency and type of operations in the recreational and commercial drone space.

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

No ,

Please comment:

Staying 4 kilometers away from airports whilst operating a drone is common sense and internationally, well understood. This has been highlighted by the un-verified, evidence-free yet highly publicized Gatwick and Heathrow incident in 2019 that directly instigated a human rights violation by the UK law enforcement and CAA agencies shortly afterward. New Zealand has a robust measure in place that allows "shielded operations" to take place. There is also evidence that incursions into controlled airspace in NZ are on a downward trend. This innovative approach to risk-assessed drone operations in airspace needs to be maintained.

Q14

Should we change the requirement to gain consent to fly above property?

Yes – remove the consent provision completely,

Please comment:

The existing provision is not useful. "Safe distances" would introduce highly subjective measurement systems that could be contested.

Q15

Should we change the requirement to gain consent to fly above people?

Yes – remove the requirement completely,

Please comment:

The existing provision is not useful. "Safe distances" would introduce highly subjective measurement systems that could be contested.

Q16

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Other (please specify):

No other users of the airspace have this imposition.

Q17

Are there any other major Rules changes we should consider?

The premise that recreational drone use is structured by tightly coupled rules as opposed to a performance-based, risk-assessed regulatory framework should be considered.

Q18

No

Are there any minor changes to the Rules that would make them easier for you to understand?

Q19

What do you think of the proposed minor Rules changes?

On the whole, these proposed high-level changes are acceptable

Q20

Are there any other changes we should consider?

The requirement for FPV pilots to have a spotter should be relaxed.

Page 5

Q21

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Yes,

Please comment:

A basic qualification is a sensible approach and is well overdue.

Q22

What impact would a basic pilot qualification likely have on you?

It would be very useful to have tangible evidence of a basic qualification that could be shown on demand in the field.

This will also make drone pilot integration into Health, Safety and Well being frameworks a lot less problematic.

Q23

What format should this test take?

Electronic/online theory test

Q24

Should there be a minimum age for basic pilot qualification?

No

Q25

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

No,

Please comment:

This seems like the introduction of first and second-class qualifications and reeks of industry bias.

Q26

Is there any other special authorisations you would like to see?

Respondent skipped this question

Q27

Should we introduce the proposed drone registration system?

Yes, with changes,

Please comment:

This is common practice internationally, However, It will be a major imposition upon those that operate multiple DIY drones used for the purposes of research. This is due to the iterative nature of research and the continual upgrading and changing of airframes and hardware. It would be useful if it was clearly defined what specific part of the drone was being registered.

Q28

What impact would drone registration likely have on you?

More compliance and I assume more costs.

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

A digital platform would be great if it had attention paid to its User Interface and the User experience.

Q30

Should there be a minimum weight threshold for registering a drone?

Yes, but with a different weight as the threshold ,

Please comment:

The stated rationale for the introduction of a 250-gram threshold is flawed. The cited paper even goes so far as to state that "The 250 g threshold is a compromise between numerous conflicting interests and as described above not really a good measure for the lethality of a drone." It is also noted that the data sets generated and expanded upon are probabilistic as opposed to real-world research. The threshold of 1-2 kilograms from a user's point of view is a more practicable and expedient datum.

Q31

Should certain drones not need to be registered (select all that apply)

No,

Please comment:

All drones that sit above the threshold should be included. The introduction of designated areas having a dispensation is not equitable.

Q32

Should we introduce remote ID?

Yes,

Please comment:

It is well understood that the available technology for remote ID is currently sub-optimal and has not resulted in any usable hard or software. This is also compounded by current legal challenges to the Remote ID scenario in the United States. (RDQ vs FAA). It is obvious that sub-military-grade technology, remote ID systems are yet to materialize. The Internet of things (IoT) approach unflurled in Figure 5 on page 51 of the discussion document is old thinking that is not fit for purpose. This offers New Zealand a real opportunity to disrupt. Perhaps the commissioning and funding of an open-source remote ID solution that grafts onto known firmware such as Ardu-pilot or Beta-flight for its data and allows for use case development of readily available hardware could be useful. It should also be noted that recent rapid developments by the open-source community in the DJI FPV system have been embraced by them. Specifically the OSD hack, FCC hack, and Digiview hack. This points to an emergent relationship with DJI that is beneficial to both and could be expanded upon. The considerable knowledge base and expertise available in the NZ tertiary sector in the area of real-time data processing, wireless broadcast and perhaps vision based Artificial Intelligence (AI) could provide an expedient solution that could become a global standard in a timely manner that would require no maintenance by the regulator and would be supported by a network of developers already in place.

Q33

What impact would remote ID likely have on you?

Cost and compliance.

Page 8

Q34

Should we consider introducing geo-awareness?

Yes,

Please comment:

It is a logical next step in autonomous vehicles.

Q35

What impact would geo-awareness likely have on you?

Cost and compliance.

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

I am disappointed that BVLOS is scheduled to be the sole domain of CAA part 102. Currently, developments in the FPV technology arena allow for long-range flight as does mission planning in other mature open source software such as Ardu pilot. It would be a real missed opportunity for NZ if these innovative advancements were inhibited by regulation that did not take into account risk assessment and technical literacy/ mastery of pilots that are considered to be CAA part 101 and can not afford to be CAA 102. The proposed measures such as pilot licencing, registration and remote ID are inevitable and align with the government's strategic direction, however, there is seemingly no room for academic research in the BVLOS area.

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

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THE MINISTRY OF TRANSPORT