



Dear [REDACTED],

Owing to the delays experienced in being able to activate EG D097, we would like to request a 2-month extension to the availability period notified in AIC Y 011/2021 which currently expires on 23<sup>rd</sup> September 2021. This period would be to run from 21<sup>st</sup> Oct – 16<sup>th</sup> Dec as we have missed the AIRAC cut-off date for a seamless extension in September.

At the time of writing, only one of our UAV operators have received OSC permissions to operate BVLOS in EG D097 and we have only activated the TDA on 2 occasions, the first of which was this week. The reasons for delays to activation of EG D097 were associated with meeting conditions set out in CAP2106A. Namely, CAA Operating Safety Case (OSC) permissions and CAA Acceptance of Goodwood ATS Temporary Operating Instructions (TOI).

Owing to the 4-month delay there is not enough time remaining to collect the data that was identified in the original trial plan, to fulfil the objectives of the first part of the trial, by 23<sup>rd</sup> September. This is because Auriga Aerospace, as the main UAV operator in the trial, is still to rectify some issues prior to obtaining their BVLOS OSC. We therefore only have Skyports available for BVLOS testing who are donating their time for free and we are limited in the amount of time they can dedicate during the next month. In addition, FISO rostering is difficult to juggle with so much uncertainty with the Auriga application.

We are still working towards meeting the same objectives set out in Trial Plan V3 and therefore no change to the plan exists, other than the associated timelines and the dimensions and hours of activation. However, unless we can secure more funding, owing to our project time and funding/budget constraints, it is now unlikely that we will be physically submitting a Trial Plan Part 2 to request BVLOS operations in a temporary TMZ. We do however still believe we can gather the evidence required which would set the foundations for BVLOS operations with a TMZ, not a TDA. What we mean by this is that we can share our learnings with the CAA Sandbox so any other UAS applications wishing to progress with a BVLOS/TMZ concept will be able to build on what we have found.

We have notified our stakeholders of our intent to make this request and the responses we received were positive. We believe this is largely due to our proposal to significantly reduce the size of EG D097 for the extended period as well as limiting the times of activation to 0630-0900 local Mon-Fri, with no PM activation.

The reason for reducing the size of the TDA to the South are because:

- Lessons learned so far from our VLOS, eVLOS and limited BVLOS testing have shown that our routes to the north of Goodwood contain all the most challenging characteristics required to test, develop and refine the concept. The undulating terrain generates difficult low-level surveillance coverage demands together with C2 link and other BVLOS mission issues. They are a perfect test bed, meaning if we can meet our objectives there, the concept will be more transferrable for more BVLOS applications.



- This will further reduce the perceived impact on other airspace users regarding having to avoid EG D097 to the South and the concern from some that this compresses traffic into a funnel. There is no Controlled Airspace boundary to the South to generate compression and most users can also transit over the TDA however the proposed reduction in size, in our view, eliminates this perceived impact. Whilst we demonstrated that the existing EG D097 mitigates any impact on Bognor Regis Gliding Club to a suitable extent, the proposal here further reduces any perceived impact.
- We had hoped that it would remove any dependency on ACP-2021-002 who were restricted in their CAA permissions from TDA activation on the same day as EG D097. However, from our recent discussion, we understand this dependency will continue to exist.



No complaints have been received to-date although this is as expected given that we have only activated the TDA on 2 occasions. We have however been performing VLOS testing at Goodwood Aerodrome and the Aerodrome have received no noise complaints.

As, even with these changes, we understand a dependency will still exist between ACP-2021-002 and ourselves during the requested Oct-Dec period, we appreciate that the opportunities to activate EG D097 may be limited. However, we want to maximise the time available and seize every opportunity to meet our objectives and share our learning with industry. We are learning a great deal and we want to continue to break barriers and create solutions to the issues uncovered.

The reduction in size of the TDA would negate the requirement to extend the following LoAs which would expire on 23<sup>rd</sup> September:

- [REDACTED]
- Trax and Skylift ACP-2021-002

An extension to the TDA period would require extensions to the validity periods of the following LoAs:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

A new LoA will be required between Trax and Skylift for the period 21<sup>st</sup> Oct – 23<sup>rd</sup> Nov.

Goodwood ATS TOI [REDACTED] would require an extension and an update to the figure in Appendix 1.

To confirm, this request for an extension is so we can maximise all remaining time in our project to meet the objectives in Trial Plan Part 1 however, as stated above, a subsequent physical request for a temporary TMZ is now unlikely owing to the project funding and time constraints. The table below summarises what, at the time of writing, we expect to meet, subject to the TDA extension together with adequate activation opportunities. We believe that the evidence gained and the lessons learned from the outputs of our project for Objectives 1, 2 and 5 will be invaluable for the wider UAS industry who are in also working towards BVLOS operations in non-segregated airspace.

Trial Plan Part 1 Objective	Expected outcome subject to TDA extension
The key objective of the Trial Part 1 within the TDA is to gain sufficient evidence and assurances for the CAA to enable a request for the 2nd part of the trial – BVLoS operations within a TMZ.	Owing to our project time and funding/budget constraints, it is now unlikely that we will be physically submitting a Trial Plan Part 2 to request BVLOS operations in a temporary TMZ. We do however still believe we can gather the evidence required which would set the foundations for BVLOS operations with a TMZ, not a TDA.



1. Document the surveillance & rebroadcast coverage, limitations and system accuracy.	Expected we will meet this objective subject to us being able to activate the TDA 21 <sup>st</sup> Oct – 16 <sup>th</sup> Dec. We understand Skylift TDA expires 23 <sup>rd</sup> Nov
2. Document the reliability of the surveillance and re-broadcast system together with fall-back procedures.	Expected we will meet this objective subject to us being able to activate the TDA 21 <sup>st</sup> Oct – 16 <sup>th</sup> Dec. We understand Skylift TDA expires 23 <sup>rd</sup> Nov
3. Demonstrate and evaluate the benefits of rebroadcasting the surveillance picture via TIS-B.	Expected we will meet this objective
4. Demonstrate safe UAS BLVoS operations alongside participating conventional fixed-wing and rotary aircrafts in segregated airspace. This includes the ability to safely operate UAVs in and out of Goodwood Aerodrome alongside participating conventional fixed and rotary wing traffic arriving and departing the aerodrome.	We will only partially meet this objective as the CAA UAS team are not allowing any manned aircraft or even other UAS assets to be active in the TDA at the same time as BVLOS operations. This is despite those aircraft being procedurally separated at all times and all participants specifically briefed.
5. Document the proposed operating procedures and protocols that UAS operators must be able to demonstrate they can meet in order to obtain CAA permission for BVLoS operations in non-segregated airspace (TMZ).	Expected we will meet this objective subject to us being able to activate the TDA 21 <sup>st</sup> Oct – 16 <sup>th</sup> Dec. We understand Skylift TDA expires 23 <sup>rd</sup> Nov
6. Understand whether the provision of a Flight Information Display (FID) for a FISO is considered a requirement to enable the safe integration of Unmanned and Manned aviation into an active aerodrome environment in non-segregated airspace (in the case of this part of the trial, a simulated non-segregated environment within a TDA). If this is a requirement, we will understand the minimum characteristics in terms of the fusion of surveillance data provided to the FISO. i.e. whether the FID needs to display all conspicuous traffic to the FISO or just the presence of the unmanned traffic.	We will partially meet this objective but without qualitative evidence owing to the inability to physically use the FID that was installed.

Please do let me know if you require more information.

Kind regards,



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