

The following table reports the EASA answers to the questions / remarks that have been received through the sli.do tool during and before the UAS workshop held by the Agency on 05.07.2017. The “score” column indicates how many votes in favour each question received from participants.

## DISCLAIMER

These answers are provided to further clarify the proposal currently under consultation and to assist commenting. The information provided in this document is of a general nature only and is not intended to address the specific circumstances of any particular individual or entity. It may be used as a tool of guidance but under no circumstances may the document substitute officially adopted legislative and regulatory provisions. EASA accepts no responsibility or liability for any actions resulting from the use of the information contained in this document.

#	Question	Score	Answer
1	U-Space: I Understand, that we will Not have detect & avoid against uncooperative targets until 2025? Does that mean, no BLOS?	18	That is correct. No BVLOS for operations which will require detect&avoid against uncooperative targets. However, until a reliable detect & avoid system will not be available, some other mitigation means may be identified to allow BVLOS operations, such as segregated area
2	Many thanks to the EASA team (+ helping experts). It’s a challenging task. You are doing your best, we appreciate it. A lot still to be done.	17	EASA appreciates the comment
3	Is the online training course identical in each EU country/language?	16	As stated in UAS.OPEN.40 and UAS.OPEN.60 the online training as well as an online test will be done in a manner and format established by the Agency. Depending on the outcome of the consultation the indications about online training format may be further adjusted.
4	Will SORA exclude national risk assessment methodologies in the nearby future? Any other impact to take into account in relation with E.U. national regulations?	16	Article 11 states AltMoC may be used to comply with Regulation (EU) 2017/XXX and its implementing rules. National risk assessment methodologies can be applied, as long as they can establish compliance with the regulation. Please see points 5.a,b,c of article 11 for further requirements.
5	no practical competence is required to be trained or examined although the remote pilot is the sole responsible to avoid because the manned aircraft cannot see.	15	For operations where the inherent risk is relatively higher, in the specific category, practical skills may be needed, depending on the outcome of the risk assessment.
6	How, when, within what timeframe and by whom will the standards be produced (required for CE labelling be)?	14	We plan to work with the European Unmanned Aircraft Standard Coordination Group . Standard supporting the CE marking must be developed under the auspices of CEN/CENELEC/ ETSI. Mandates on Registration, E-identification and geo-fencing are being prepared so that they are agreed in November at the relevant committee
7	Does NPA apply to tethered drones? They are not even mentioned.	14	The new Basic Regulation (replacing the EU 216/2008, currently in discussion in the EU Parliament) will exclude non powered Tethered aircraft up to 25KG from EU competence,. EASA has further requested the extension of this exclusion to powered tethered drones of less than 25kg

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8	Can a more definitive definition of assembly be provided? Is this 10s or 100s of people. NAAs will face this question from operators.	13	This is a terminology already used in the regulation EU 965/2012 (Air operations) to indicate an area with a large gathering of people like a music or sport event. So it should be understood in the same way.
9	Can one product be marked with several categories? A phantom could be c2, c3 and c4 depending on the expected use.	13	This should possible provided the UAS complies with all the requirement of the classes and is used in accordance with the requirement of the relevant category
10	Why is 5 megapixel a criteria to mandate geofencing and electronic identification for C1? Most cameras go beyond 5MP.	13	The proposed threshold drives the requirement for e-identification to mitigate the higher privacy risk of high resolution sensors.
11	Repeat: Categories C1-C5 are not mutually exclusive - can a product be marked with several categories?	13	This should possible provided the UAS complies with all the requirement of the classes and is used in accordance with the requirement of the relevant category
12	This is much more complicated than FAA Part 107 which is the American equivalent of Open. What is the actual safety risk, that justifies this complex approach?	13	This NPA go beyond the scope of FAA Part 107 since it allows operations of UAS over people (subcategory A1) and close to people (subcategory A2). FAA part 107 can be considered equivalent to subcategory A3 only. The increased safety risk for subcategory A1 and A2 is mitigated through the technical requirements (ensured via the CE Mark) and pilot competence.
13	Can you turn the temperature of the room down?	12	N/A
14	How will be the process to select the compliance body (notified body) which will provide the CE Marking (declaration of conformity) in the open category?	12	The notification of assessment bodies and the associated requirements are described in Annex II MKR of the NPA
15	When can one realistically expect the final Regulation to be in force?	12	the NPA envisage the entry into force in 2020/2021 depending of the topics. One of the drivers is the CE marking. DG Grow is envisaging 3 years for developing a standard. This would be consistent with the NPA proposal
16	How does EASA see external threats to this U-Space? i.e. hackers, system malfunctions, non compliance by drones users?	11	These are security issues which are already today being addressed by national security agencies. The U-Space will mandate technological solutions or reduce these effects

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17	What are the proposed different types of UAS Pilot licenses?	11	<p>NPA 2017-05 only covers UAS operations in the open and specific category. For these operations a remote pilot licence is not required, this is only required in the certified category, as stated in the EN under 2.3.16: A UAS operation is then classified into the certified category when considering the risks involved, it requires the certification of the UA and of its operator, as well as licensing of the flight crew.</p> <p>In the upcoming NPA regarding UAS operation in the certified category there will be only ONE remote pilot licence with appropriate endorsements (class, category and type rating of RPA and associated RPS, operational limitations, etc.). This is in line with the proposed amendment to ICAO Annex 1 (see ICAO State Letter AN 12/1.1-22-17/53 on 03 May 2017 (Subject: Proposal for the amendment of Annexes 1, 2 and PANS-TRG (Doc 9868) related to remotely piloted aircraft systems (RPAS), This remote pilot licence has been created on the same basis as that of a commercial pilot for manned aviation.</p>
18	Can you explain the room that will be left for member states to implement stricter rules, and how would this be handled in the training, the leaflets, etc... ?	11	The objectives is to establish a common regulatory framework and to allow European wide efficient safety promotion bases on the same rules. Nevertheless the proposal allows for local adaption ,e.g. through allocation of areas.
19	Its getting hot in here	11	N/A
20	Before doing regular (B)VLOS operations in controlled airspace, is there the need to adopt the rules of the air (ICAO level)? If yes, what about your timeframe?	10	When the rules will be in place, this will be determined by the Conops approved by the NAA with a risk assessment or the Conops for which a TC and CofA are granted.
21	SUB-categorization only considers ground Risk. What about the air Risk?	10	Also air risk is considered in the NPA. Since also a small UAS (heavier than 250g) could harm, especially a General Aviation aircraft, for all subcategories air risk have been mitigated through VLOS, maximum height of 120m (with technical limitation) and pilot competence.
22	The first 'do' in the safety leaflet refers to 'adequate insurance'. Why is there no insurance requirement in the NPA?	10	BR says "an operator of an UAS must be aware of the applicable Union and national rules relating to the intended operations, in particular with regard to safety, privacy, data protection, liability, insurance..." for this reason it was decided to add in the leaflet an entry dedicated to insurance. Anyway EASA has no competence on insurance. Regulation EC 785 will still apply. EC was requested to provide clarification on regulation EC 785/ on insurance

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23	Will the FPV mode be considered as VLOS operation? If so, the distance from the remote pilot can be extended without limits. Any requirements for Extended-VLOS?	10	(1) Operations in FPV can be conducted only in case the remote pilot is assisted by a UA observer positioned in their proximity (AMC1 UAS.OPEN.30(c)(6)). (2) As for E-VLOS: Keep the UA in VLOS or within a range such that the remote pilot, or a UA observer situated within the line of sight of the remote pilot, maintains VLOS (UAS.OPEN.30(c)(6)).
24	How would "user pays" work - especially if EASA provides support for only some MS?	10	EASA provides support to all Member States
25	The NPA is focussed on aviation. The industry is seeing drones purely as tools, making business more efficient. How EASA takes into account this discrepancy?	9	The NPA has been developed to ensure that also companies not familiar with aviation will be able to understand the basic requirements to make its operation safe.
26	About the Market Part (Part MRK), will be considered the development of similar specifications for the Specific Category, including the possibility of CE mark?	9	The risk assessment or the standard scenario will define the design requirements for the UAS.
27	Indoor Operation: what is the Limit? Will a Camera-Drone in a big Stadium with a closed roof still Qualify for indoor and be therefore not regulated at all?	9	Only operation in the EU skies are under EASA competence. All indoor operations will need to comply with public safety requirements and in this case drones will be need to comply to the same regulations as all other equipment used during the event.
28	How do you avoid 'flags of convenience' , in Operators going 'forum shopping' for a LUC, which allows Operation in whole Europe?	9	The current manned aircraft regulation already establishes full EU recognition of certificates issued by a MS, for example the POA (production organization certificate)
29	Is 2021 realistic for CE requirements considering that no mandate has yet been given to any EU standards body and industry will have to adapt afterwards?	9	DG-Grow indicated 3 years for the development and adoption of a standard. Mandates are being developed so that they can be adopted in November 2017. So 2021 is doable but tight
30	In case of small manufacturer (home build) want to operate in professional way. Who will make drone accreditation? Member state or EASA?	9	When the UAS is used in the open category there will be no assessment: it could operate in A1 if below 250g or in A3 if above that mass When the UAS is operated in the specific category, the risk assessment will define the design requirements. These will be reviewed by the National Authority who approve the risk assessment. When the operator uses a risk assessment with declaration, it will have to declare that the UAS comply with the design requirements of the standard: scenario
31	Registration is mentioned, but its not clear what the system will look like. Pan-European system? Member States? Will it be interoperable?	9	The system needs definitely to be interoperable which can also be implemented with national registries.

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32	Why do only C3-C4 have to keep a "safe" distance from aerodromes and not C1-C2, knowing that they are allowed to fly till 120m? (UAS.Open.60(b))	9	Aerodromes will be protected by no drone or limited drone zone. This will be applicable to all subcategories. In UAS.Open.60(b) we added an additional limitation to take an additional safety distance from "from the boundaries of congested areas or aerodromes" for operations with C4 or homebuilt >250g drones. This is due to the lack of any technical requirement for this class protecting from a possible loss of control of the aircraft
33	About insurance: Who is defining the requirements (and when)? Will it be mandatory? Will it be proportionate for different UAS categories?	9	BR says "an operator of an UAS must be aware of the applicable Union and national rules relating to the intended operations, in particular with regard to safety, privacy, data protection, liability, insurance..." for this reason it was decided to add in the leaflet an entry dedicated to insurance. Anyway EASA has no competence on insurance. Regulation EC 785 will still apply. EC was requested to provide clarification on regulation EC 785/ on insurance
34	Is there a european database where "no fly zones" are published and updated? Who is responsible for updates on drones? The operator or the manufacturer or both?	9	According to the NPA, each country authorities would be responsible for defining the no-drone zone and make this information available user-friendly way. At a later stage the format in which these information will be made available in order to have consistency across EU countries will be defined
35	What is the target level of safety in terms of fatalities per hours of operations? And how are we going to measure it?	9	According to the SC-RPAS.1309-01 issued on 24 July 2015, the target safety level for catastrophic events is $10^{-6}$ . Furthermore Article 3 of the proposed NPA, requires to the operator to report any occurrence causing fatalities or serious injury or it involved aircraft other than unmanned aircraft (according to article 125 of the revised proposed Basic Regulation).
36	How does EASA think it can protect regular aircraft from drones? And more importantly, how to enforce it?	8	The risk of collision with manned aircraft is mitigated by several measures such as maximum height, pilot competences, zones around airports, altitude limiter and when mandatory geo-fencing. Enforcement should be by an authority designated by the member state. Enforcement will be assisted by registration and e-identification when mandatory
37	How are you going to enforce the "do not make modifications" to the drone? With the UAV community being based on tinkerers, this rule might deter many.	8	There will be a need to provide some guidelines to explain what is possible or what is not. A heavily modified UAS above 250 g may continue to be operated as home built in sub-category A3 or under the specific category
38	How does EASA foresee the integration of the open category drones in U space?	8	The proposed regulation on open category drones already today includes the basic requirements needed for the first phase of U-Space (i.e registration, e-identification, geo-fencing)
39	How does EASA envision sustainable BVLOS operations without detect and avoid in the current aviation system?	8	They can be approved by the NAAs on the base of a risk assessment (the SORA is adopted by the Agency as MoC) which shows that sufficient mitigations means are put in place in terms of harm barriers and threat barriers

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40	Notified bodies and qualified entities are subject to same criteria (independence; technical competence; integrity; etc.). Rules should establish equivalence	8	Notified bodies and qualified entities have similar requirements however are used for different purposes. They may require different technical competences. So the equivalency is not automatic
41	Evidence based regulation: where is the evidence that the C3 and C4 category requirements (e.g. age limits, additional CE) are proportional to the 'low' risk?	8	For both categories C3 and C4, we use a qualitative reasoning approach based on experts judgement. For C3 we have a minimum set of requirements related to lost control of the drone while on C4 we do not have such requirements so it is mitigated by strict operational limitations.
42	Why is there a 4kg limit for C2 as opposed to 5kg, which is a standard weight limit in many EASA member countries for VLOS flights?	8	No standard weight is available at EU level. Explanations on why the threshold is set at 4 kg is included in the document. It also took into consideration the information gathered on the drones types currently used.
43	Why are privacy rights not purely regulated by GDPR, out of EASA regulations?	8	In principle privacy is out of the scope of EASA but the proposal should support the regulations required in the new essential requirements
44	Given the present rate of violations of the existing regulations, Enf and Impl is crucial. Do we already have best practices of successful Enf and Impl to share?	8	we agree enforcement and implementation is crucial.it is a good idea to collect best practices and w plan to consult Member States to obtain such best practices.
45	What additional level of safety is expected with a max height of 120m, while many EU countries have a current max height of 150m, without major incidents?	7	The request of adding an additional margin of 30 meter below 150m (VFR height) came from most of members of the drone experts group supporting the development of the NPA (especially from Member States and manned aviation organisations). Considering the possible error when determining the altitude, EASA considered this margin, even if not essential, useful to limit the risk. So in the view to define a framework reaching a consensus, it was agreed to include it.
46	With this leaflet you assume that one and the same drone cannot be used in different scenarios/classes. Our experience is that this is not correct.	7	The NPA allows for this possibility provided the UAS complies with the requirements of the different classes and its use complies with the requirements of the different subcategories
47	How will the maximum height be measured for non compliance?	7	The people doing enforcement will have to be trained. Evaluating the height may be done by references to buildings, obstacle or trees which height above ground can be evaluated . Other solutions could be to use empirical methods such as the angle captured by 4 fingers at arm length. The point is not to measure accurately but try to identify blatant infringement. The risk of flying higher is mitigated by height limiters. The enforcement authority can always take pictures which can be afterwards interpreted

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48	Does EASA plan to change reg 785/2004 on insurance requirements or should it be up to each member state?	7	BR says "an operator of an UAS must be aware of the applicable Union and national rules relating to the intended operations, in particular with regard to safety, privacy, data protection, liability, insurance..." for this reason it was decided to add in the leaflet an entry dedicated to insurance. Anyway EASA has no competence on insurance. Regulation EC 785 will still apply. EC was requested to provide clarification on regulation EC 785/ on insurance
49	When will we see the final SORA of JARUS, and when/how will it be adopted by EASA?	7	By the end of July a SORA version which can be used for risk assessment will be available on the JARUS website. Updates may be published in the future. EASA will adopt it with the adoption of the Opinion to be published after NPA consultation.
50	Who is able to do SORA Risk assessments? What kind of qualification is needed? Does this "qualified entity" needs special approval/certification?	7	Operators must perform risk assessment to operate in the specific category. This can be performed according to the SORA methodology or an alternative one accepted by the NAA of its principal place of business. There is no qualification requirement to be met to perform a risk assessment but of course it can be accepted by the NAA only if performed appropriately. Regulation (EU) 2017/XXX includes requirements on accreditation of qualified entities.
51	Bearing in mind that Reg.785/2004 is not applicable to drones, would it not be useful to create specific rules regarding coverages according to classes or risk?	7	BR says "an operator of an UAS must be aware of the applicable Union and national rules relating to the intended operations, in particular with regard to safety, privacy, data protection, liability, insurance..." for this reason it was decided to add in the leaflet an entry dedicated to insurance. Anyway EASA has no competence on insurance. Regulation EC 785 will still apply. EC was requested to provide clarification on regulation EC 785/ on insurance
52	I don't think the dronerules.eu website was worth the money the EU gave it. Consider a more effective means.	7	The dronerules.eu is a good start but is not finished yet. Your suggestions to improve it are welcome
53	Are you going to issue an european pilot license UAVS as the pilot JAA license	6	EASA does not issue licenses. This is always done by the competent authority. This is for manned aviation and will be the same for unmanned aviation. (See Part-FCL of the Aircrew Regulation 1178/2011). Next to that, this NPA 2017-05 does not propose any remote pilot license for operations in open and specific category. For the certified category, see answer above.
54	How will recreational pilots be integrated in the U-Space framework that seems to be mainly designed for automated commercial operations?	6	Recreational pilots with small drones will be allowed to fly when they meet the requirement for the area where U-space services are offered. For more information: <a href="https://www.sesarju.eu/sites/default/files/documents/reports/U-space%20Blueprint.pdf">https://www.sesarju.eu/sites/default/files/documents/reports/U-space%20Blueprint.pdf</a>

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55	Drones are attractive because they are a cheap alternative to perform difficult work. How do we keep cost down with connectivity and knowledge requirements?	6	As regarding knowledge requirements: for most of subcategories not expensive solutions are envisaged. For connectivity, we understand you refer to U-space: requirements will need to be detailed in the near future, therefore no precise estimates on the cost can be currently defined however standardization of these requirements could allow to share the development and design costs over the large number of drones affected.
56	Transmission of identification data: to who and what? What ground-based equipment is needed? Will this be linked to ATC?	6	Exactly these issues will be defined through standards developed in the context of the NPA follow up and the U-space development.
57	How the online Training will Look like? What are the proposed subjects or learning objectives? How Long is the Duration of the online Training?	6	<p>As stated in UAS.OPEN.40 and UAS.OPEN.60 the online training as well as an online test will be done in a manner and format established by the Agency.</p> <p>In AMC1 UAS.OPEN.40(b)(5)(i) and UAS.OPEN.60(e)(1) Basic competence of the remote pilot to operate in Subcategory A1 and A3, more detailed information is given what this online training should cover, such as:</p> <ul style="list-style-type: none"> <li>• This regulation and other relevant EU regulations on privacy and security; <ul style="list-style-type: none"> <li>• an understanding of the privacy risks;</li> <li>• an understanding of the security risks;</li> </ul> </li> <li>• an understanding of the UAS categories and their operational limitations;</li> <li>• familiarisation with the instructions provided by the manufacturer for the operation of a UAS</li> <li>• finding a suitable area to conduct the familiarisation flights and learn how to fly the particular UAS</li> </ul>
58	Member States proposed a much simpler subcategorization. What were the risk-related reasons for not taking into account these so-called "Simple Rules"?	6	Many of the elements of the "simple rules" are included in the proposal. There was some adjustment taking into consideration also the views of other affected stakeholders.
59	Will EASA take ownership of the JARUS SORA and subsequently issue SORA as an EASA document (in stead of referring to the JARUS SORA)?	6	EASA will publish the SORA as an AMC in English
60	is self-authorization a concept known in manned aviation? If not, why should it be allowed in this unknown sector?	6	Self authorisation is a well known concept (DOA, Aerial work)



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61	40,000 model pilots in the UK with 600,000 aircraft. What benefit does registration of individual aircraft provide when there is no existing problem?	6	EASA recognizes that technically distinguishing model aircrafts from other recreational drones was not possible by means of a definition of "model aircraft". Also note that in accordance with AMC1 UAS.SPEC.20 Model club and/or associations may fulfil the UAS registration requirement on behalf of their members and Registration of each individual model aircraft can be avoided if the NAA establishes that it is possible to do so
62	When will EASA define performance requirements for detect and avoid systems ?	6	EASA is actively involved in JARUS where the Working Group 4 is dedicated to this activity.
63	Hello in my country (Italy) ENAC gives a Flight Permit to use drone, does EASA want to establish something similar to use drone in European Skies?	5	The specific category authorisation is seen as equivalent but more standardized and european wide applicable
64	Why can my son fly sailplanes with 14 years but drones from 16 years?	5	Your son can fly drones when under 16 years and without supervisor, when he flies a drone in UAS subcategory A1. He can flies a drone in category A2 and A3 under 16 years but then with supervisor. Please refer to Table 2 on page 15 of the EN of this NPA 2017-05
65	Will the presentation materials be made available and if so, how will they be accessible?	5	They are available online
66	The NPA makes special provisions for traditional model flying. How will our activity be recognised and incorporated into the U-space blueprint?	5	Traditional model flying will be allowed to fly when they meet the requirement for the area where U-space services are offered. For more information: <a href="https://www.sesarju.eu/sites/default/files/documents/reports/U-space%20Blueprint.pdf">https://www.sesarju.eu/sites/default/files/documents/reports/U-space%20Blueprint.pdf</a>
67	What are the requirements for a detect & avoid system to fly in U-Space?	5	This is too early to be known. SESAR is undergoing research with related demonstrators. Automated DAA are envisaged for the step U3 as described in <a href="https://www.sesarju.eu/sites/default/files/documents/reports/U-space%20Blueprint.pdf">https://www.sesarju.eu/sites/default/files/documents/reports/U-space%20Blueprint.pdf</a>
68	The NPA does not provide any distance between RPAS and aerodromes. Can EASA provide an AMC to this NPA to harmonize this principle and the minds until uspace?	5	Member States will define no drone or limited drone zone that will protect airports. We will evaluate the possibility to include an AMC to harmonise it.
69	How do you define "Fly over uninvolved people (...)?"	5	GM1 UAS.OPEN.50(b) and UAS.OPEN.60(b) provides an explanation of uninvolved persons
70	Can I register my backyard as drone-free due to privacy?	5	The AMC requests drone operators not to fly below 20 m above private property
71	Its good to see laws protect the citizens but in which part of the NPA the UAS and the pilot is protected against attacks during flight?	5	This should be covered sufficiently through existing national regulations

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72	Will the FPV mode be considered as VLOS operation? If so, the distance from the remote pilot can be extended without limits. Any requirements for Extended-VLOS?	5	same question as in line 23, same answer
73	Why not a remote pilot licence?	5	Conform the proposed amendments of ICAO Annex 1, only a remote pilot licence is needed for remote pilots engaged in international air operations when operating UAS in accordance with instrument flight rules (IFR) in controlled airspace and at controlled aerodromes. This is only for 'certified category' or sometimes the 'specific category', depending on the SORA. In the Impact Assessment to this NPA several options regarding remote pilot competence were discussed on for the open and specific category it was decided not to have a full remote pilot license.
74	Is the LUC privilege to authorize its own operations transferrable into another country of operations ? What is the process?	5	Yes, a LUC has validity in all MS. Nevertheless an operation based on a LUC is still an operations performed under the specific category. The Operator must verify that the local conditions are such that the operation falls under the LUC terms of approval.
75	Is there any estimation of the number of authorizations/declaration/Luc operations expected where MS authorities have to coordinate?	5	In the Impact Assessment (IA) an estimate of the number of UAS professional operators is provided based on the replies received by several Member States Authorities (page 107 of the NPA 2017-05 B): this might give some general indication on the magnitude of authorisations/declarations/LUC. These estimates have been considered to assess the cost of authorisations and the savings by having a LUC with assumptions stated in the IA. The future definition of the standard scenarios will of course impact on the number of authorisations/declaration/LUC.
76	Will EASA adopt the ICAO RPAS manual requirements for BVLOS flights?	5	Standard scenarios within the specific category is the first tool that will be used in Europe in order to address BVLOS flights. Some elements of the ICAO RPAS Manual may be considered in the analysis but the specific category and its standard scenarios are not required to comply with the manual.
77	If there will be a standard scenario for aeromodelling, how will be the relationship to §14 ?	4	It could be a possibility for large model aircraft, for example above 25 Kg, but no for all aeromodelling
78	Geo-fencing (&EI) are based on GNSS 'valid' position. GPS SiS is provided 'as it is', no integrity ensures the nav solution. Could be EGNOS a solution? How?	4	Other sources of position than GPS may be acceptable. EGNOS and Galileo are examples
79	Many people start model flying basic models on their own & in a non club environment. How will EASA rules allow this without removing their freedom to do so.	4	The Open category cater for this need, in particular Subcategory A3

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80	Who should enforce the new rules? Police? How do you ensure, that these Enf and Impl-bodies are up to date? How do you ensure, that they can find uncooperative?	4	In our view, enforcement should be done by law enforcement authorities as you need to be close to the activities.. A dialogue need to start very soon to explain the rules and better understand their need.
81	You mentioned cost of Training as driver für Regulation. Is it Not the Need for Training which should drive the requirement, and the cost is then a consequence?	4	It was not mentioned so. The cost of training information gathered helped to understand the impact of including different types of training in various options. The cost is indeed the consequence of what is proposed to solve the issue (inadequate competences) pushed by drivers.
82	Will all of the presentations be available online?	4	Yes
83	Would commercial drones flying in U-space be capable to detect and avoid birds and model aircraft not equipped with electronic identification?	4	The detect and avoid requirements/standards have not yet been defined.
84	How does U-Space address vehicle to environment? For example, uninstrumented aircraft and potential obstacles in the airspace and utilizing the infrastructure?	4	This should be be part of the steps U3 and U4 as described in the blue print: <a href="https://www.sesarju.eu/sites/default/files/documents/reports/U-space%20Blueprint.pdf">https://www.sesarju.eu/sites/default/files/documents/reports/U-space%20Blueprint.pdf</a>
85	NPA (article 11) doesn't clarify whether drone operators using AltMoC need prior approval from the competent authority, could you specify?	4	Article 11 determines that "The competent authority shall evaluate all AltMoC proposed by an organisation, by analysing the documentation provided and, if considered necessary, by inspecting the organisation". Therefore a drone operator proposing AltMoc may need to have its organization approved after inspection, if so required by the competent authority.
86	how will EASA, or its member states, enforce the planned rules for drones? And who will do it?	4	Enforcement will be done by Member States. Member States will decide which authority (ies) are in charge.
87	Can you explain the rationale behind geofencing/e-ID for drone with 5MP camera. Isn't it a breach in EASA's risk-based approach?	4	It is not only the safety risk that is considered. It is privacy risk based.
88	How are the curriculae of flight schools approved by NAAs going to be harmonized in the EU, which will open the doors to mutual recognition.	4	For the remote pilot competence in the open and specific category the way of competence based training is explained in GM1 UAS.OPEN.50(e)(1). The remote pilot may undertake self-study in many ways for obtaining the certificate of competence. One of these ways could be a training organisation, including declared training organisations (DTOs) or approved training organisations (ATOs). Since this training is not mandated by the Member States, the national aviation authorities (NAAs) are not required to approve the training syllabus even if this training is provided by ATOs

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89	How authorities enforce the online training requirement? Will you receive a diploma? And how can you avoid someone else taking the test?	4	An attestation should be delivered at the end of the online training. A standard should define how such on-line training should be done in particular to ensure it is the right person who passed it.
90	Pilot competence: only C2 requires a (theoretical) examination because of increased ground Risk. Why is air Risk of categories going to 120m not considered ?	4	For considerations of the chosen option, the EASA likes to refer to the Impact Assessment.
91	Why not have UAS Pilot licences?	4	See answer to question 73
92	How is a selection made between CEN, CENELEC & ETSI to produce the standards and how fast can this be done.	4	Coordination could be done by the UASCG which is already in place
93	BR Annex ix mentions insurance as does the EASA 'flying a drone' safety leaflet. The NPA does not mention it! Why?	4	BR says "an operator of an UAS must be aware of the applicable Union and national rules relating to the intended operations, in particular with regard to safety, privacy, data protection, liability, insurance..." for this reason it was decided to add in the leaflet an entry dedicated to insurance. Anyway EASA has no competence on insurance. Regulation EC 785 will still apply. EC was requested to provide clarification on regulation EC 785/ on insurance
94	What are the proposed Remote-pilot competence online training subjects or learning objectives?	4	See answer to question 57
95	Who is eligible to give a Remote-pilot competence online Training, (Authorized Training Organization) ATO?	4	The NPA gives no requirements regarding the eligibility to give a remote-pilot competence online training, Everyone can give this training. The only requirement regarding the online training is stated in UAS.OPEN.40 and UAS.OPEN.60: the online training as well as an online test will be done in a manner and format established by the Agency.
96	The NPA contains several definitions. I would like some clarification please.What does EASA define as:Model Club or Association?Toy?	3	model aircraft club or association' means an organisation legally established in a Member State for the purpose of conducting leisure flights, air displays, sport or competition activities with UAS; Toy, with regard to the NPA, is any device complying with Directive 2009/48/EC
97	Navigation incidents is the second cause of reported incidents. How can we trust in the navigation solution if GPS/GALILEO does not provide integrity?	3	GNSS especially GALILEO provides integrity sufficient for navigation for manned aviation. Geo-fencing should additionally support the operator complying to airspace limitations and together with education and safety-promotion reduce the number of airspace infringements.
98	How valid is the assumption to use existing (manned) systems to ensure safety if you drop the majority of requirements associated with these systems?	3	Requirements for UAS in this category have been evaluated with a risk based approach and therefore are proportionate to the risk of the operation.

#	Question	Score	Answer
99	Being 14, I will be allowed to fly a 900g drone @ 120m above uninvolved people at night? Is this what we are trying to achieve?	3	You can fly drones when under 16 years and without supervisor, when you fly a drone in UAS subcategory A1. You can fly a drone in category A2 and A3 when under 16 years but then with supervisor. Please refer to Table 2 on page 15 of the EN of this NPA 2017-05
100	Would it not be the time to try to set up a pan-european authority for the drones sector in order to avoid "NAA shopping" and standardisation issues?	3	There are no such plans to create a pan-European authority. The consequences of NAA shopping are limited by the inspections of Member States that will be put in place.
101	What are the proposed different types of UAS Pilot licenses?	3	See answer to question 17
102	Q to EC: who will run U-Space services and how that will be assigned? By current monopolistic national ANSPs or there will be competition open to new entrants?	3	It depends on the kind of services, whether they are more of a local, regional or national scope. This will be defined at MS level.
103	Notified bodies and qualified entities are subject to same criteria (i.e. independence) Is expected to have Rules to establish equivalence?	3	Notified bodies and qualified entities have similar requirements however are used for different purposes. They may require different technical competences. So the equivalency is not automatic
104	What benefit does registration of the 7,000,000 individual model aircraft in the EU provide over and above registration of just the pilot?	3	Registration of each individual model aircraft can be avoided if the NAA establishes that it is possible to do so, as per AMC1 UAS.SPEC.20. See also answer to question 61.
105	In the region of the alps flying in the mountain at slopes is very popular among model glider pilots. In what category shall they fly?	3	For all operations of model aircraft 3 options are possible: 1) operate in a model club or association for which the NAA provided a special authorisation in accordance to art 14; 2) MS can define those areas as UAS zone in accordance to Art 12; 3) operate in open subcategory A3
106	Who will develop and have 'ownership' of the online training?	3	As stated in UAS.OPEN.40 and UAS.OPEN.60 the online training as well as an online test will be done in a manner and format established by the Agency. Depending on the outcome of the consultation the indications about online training format may be further adjusted.
107	How will ATC or other authorities monitor and arbitrate multiple drones that are each using e-identification simultaneously?	3	It is too early to say and will be part of the e-identification design and implementation, currently in the scope of industry research and demonstrators
108	What distinction do you have between commercial and none commercial operations?	3	In light of the risk based approach, we decided not to make distinction between commercial and not commercial operations. Mitigation measures should be the same independent of the nature of the operation and be based only on its risk.

#	Question	Score	Answer
109	which type of entity is competent to provide the online training for c1, c4, c4. More explanation for self study please	3	Regarding the eligibility to give a remote-pilot competence online training, see answer to question 95 Regarding explanation for self study, please refer to GM1 UAS.OPEN.50(e)(1).
110	The Regulations for the Open Category seem to be quite complex and not easy to apply. Is there any intention to reduce this complexity?	3	The translation into safety promotion material and leaflets will significantly reduce the complexity of the material that needs to be read by operators the open category
111	MS cannot enforce existing market regulations on UA. How do these proposals deal with illegal equipment purchased by individuals online direct from China?	3	this should be the role of market surveillance authorities. Section 5 of annex market provides procedures for market surveillance
112	The very large majority of model aircraft are less than 4 kg. Would it be possible to define a sub category in A3 with less operational limitations?	3	For model aircraft special provisions have been developed (see GM to art 14). Also the class C4 has been developed for model aircraft requiring only to accompany the aircraft with documentation. Therefore an additional subcategory for lighter model aircraft would not have different requirements
113	How will PPL/LAPL/ATPL and other existing pilot licenses be recognized to speed up the LUC process? How about foreign licenses?	3	Regarding the remote pilot license, see answer to question 17.Regarding the other existing manned licenses and foreign (third country manned or unmanned) licenses, this will be regulated in the drone regulation regarding the certified category. The NPA for this regulation is planned first quarter 2018.
114	Has authority requirements been omitted purposely at this stage and if yes, what is the expected level of training an NAA inspector should have ?	3	Article 7 describes aviation authorities responsibilities. It includes in fact a list of requirements that must be complied with. A first set of AMC has been developed and can be complemented based on experience
115	How do EASA and the national Authorities control that the remote Pilot has the required knowledge and skills to fly a UAS safely without harming any person?	3	The oversight over the UAS operations is the responsibility of the competent authority. See Article 7 of this regulation and the AMCs to this Article 7
116	What about mass limit when an operator is using an aerostat like Helium airship?	3	The limit for the open category has been expressed in terms of mass which may not be well adapted to airships. Comments are welcome to what could be an appropriate limit for airship
117	If the revision of Regulation 216/2008 does not advance within the proposed timetable, has EASA already considered an alternative?	3	EASA can only work in the frame of the basic regulation
118	How the Remote-pilot competence online Training Will Look like?	3	Please see answer to question 3
119	Will a LUC given by a MS automatically be recognised by every other MSs?	3	Yes, but the Operator must check local conditions before authorizing its own operation in another MS. The Operator cannot authorize its own operation if local conditions are such that the operation does not fall under the LUC terms of approval

#	Question	Score	Answer
120	Who is eligible to give a Remote-pilot competency online Training, (Authorized Training Organization) ATO? Will it be included in Part-ORA?	3	Regarding the eligibility to give a remote-pilot competence online training, see answer to question 95 Regarding training done in a DTO or ATO, this will be only compulsory for the certified category. See furthermore our answer to question 88
121	Safety Promotion is great. But how will the promotions and regulation stop rogue unlicensed operators from flying in a dangerous manner?	3	The regulation will help enforcement through required identification
122	If EASA has not got the competence in this matter currently, how can they dismiss the help of the expert group with the regulations?	3	EASA does not have the legal competence yet. When we identify that we don't have the technical competence to react on the comments we will seek advice as needed.
123	You didn't answer many questions and I don't see many safety elements!	3	Safety is ensured in the open category through technical requirements (enforced through the CE mark), pilot competence and adequate operational limitations. In specific category a risk assessment will determine the needed mitigation measures.
124	The UK NQE system, has already established a baseline of competence for operators. Will EASA to look at a similar model? There is guidance as well in CAP722	3	The Agency has looked to all existing EASA Member States UAS regulatory framework. Please refer to Appendix V of the Impact Assessment
125	What about night opération in open catégorie ?	2	Allowed in VLOS (if equipped with lights which actually allows VLOS at night)
126	What does EASA think about UAV redundancy electronic equipments?	2	Redundancy of essential functions is one of the features which may allow a specific operation to receive an authorization from the NAA of a MS. It should be seen as one of the "threat barriers" according to the JARUS SORA methodology that will be adopted by the Agency as an AMC
127	UAS Spec. 15 in conjunction with Article 14Is it correct that this is on a DTO which are operated by national associations and model flying clubs?	2	A DTO (declared training organisation) or ATO (approved training organisation) only gives training and is not a model club or association. One of the responsibility of model clubs is to ensure that all members have a minimum level of competence. It is up to the club to define the best way to meet this requirement and using a DTO (declared training organisation) is one of the possible options.
128	We all know that some member states take EASA requests much more seriously than others, how is this issue going to be solved?	2	The intention is to organise inspections of Member States as for other disciplines. Findings may be issued at the opportunity of such visits
129	When will EASA publish SORA as an EASA document?	2	EASA will adopt the JARUS SORA as an AMC. The SORA is published on the JARUS Website and the relevant issue will be referenced.
130	Please discuss the legal applicability of the NPA after the requirements are accepted - when will the Basic	2	The basic Regulation must be changed before the opinion (EASA recommendation for draft rules to the Commission) resulting from this NPA is adopted

#	Question	Score	Answer
	Regulation change to include SUA below 150 kg?		
131	Is there an estimated cost impact to small-size drone manufacturers to support requirements like geo-fencing and e-identification?	2	Design and implementation costs estimates for several technical requirements (e.g. geo-limitation) have been gathered via survey to manufacturers. These information helped to understand if the design cost (fixed one-off) would be high and therefore impacting importantly SMEs. Further information are included in the IA.
132	Many conflicts between UA and CAT result from the inability of MS to enforce existing aviation and/or market regulations. Does the NPA solve this?	2	Article 7 requires authorities to perform inspections of UAS, remote pilots and UAS operators to assess compliance. Section 5 of Annex market defines the surveillance procedures to be implemented by Market Surveillance authorities that are defined in article 8
133	Where will be the technical requirements for the certified category of UAS? As mentioned OPS and FCL requirements will be amended, but what about airworthiness?	2	The existing material will be amended (e.g. Part 21 ) and CS will be published.
134	Has EASA considered the impact on the competent authorities for evaluating the, no doubt numerous, notifications of operations in the specific category?	2	Yes, in depth analysis has been provided in the impacts for options in the specific category. The inclusion of standard scenarios (options S2, S3) and LUC (option S3) will positively impact the workload of authorities by standardizing the authorizations and reducing their number.
135	Is there a definition of large or complex operations to be in the certified category ?	2	There is no definition yet. When such wording is retained for the certified category, an AMC will be necessary
136	Are tethered/captive drones covered by the NPA ? If yes, requirements should be relaxed compared to non captive drones in the open category.	2	The new Basic Regulation (replacing the EU 216/2008, currently in discussion in the EU Parliament) will exclude non-powered Tethered aircraft up to 25KG from EASA competence. A further request has been made to extend this to powered tethered aircraft (To cover line controlled Model)
137	For the Certified Category is the Intention of EASA to Write new Certification Specifications?	2	Yes
138	Why not EASA establish No Fly Zones around airports so all the member states follow?	2	Airspace management is a responsibility of member states. Compliance with article 12 will be checked by the inspection of member States to be put in place like for other disciplines
139	Since professional drone work is based on programmed flight plans, why to get the license it is required to show habiliy on manual monouvers? I	2	See answer to question 17



#	Question	Score	Answer
140	l'Aéromodélisme est différent de l'usage des drones, la réglementation doit prévoir cette séparation. Cela doit être "inscrit dans la loi" H.BERCHE FI(A)	2	EASA recognizes that technically distinguishing model aircrafts from other recreational drones was not possible by means of a definition of "model aircraft". Model aircrafts fall in the definition of UAS provided in the new regulation currently in discussion in the EU parliament and replacing the EU 216/2008. UAS, as models, can be used for leisure, can carry a camera or not. However this NPA recognises the good safety record of operations with model aircraft conducted in the frame of model clubs and associations. For these, art 14, provides the possibility for National Aviation Authority to issue a special authorisation.
141	Why do the class symbols/label have 'wifi symbol' next to them?	2	The idea was to symbolise the remote piloting
142	Drone C1 states impact energy < 80J or under 900g How is impact energy to be measured and will this allow large drones without required geofencing?	2	A standard will be necessary to define how 80j are measured. This should allow to depart from 900g but this amount of this deviation is not yet known
143	Is the idea of a registration system at European level (possibly managed by EASA), as proposed by the Parliament, not supported by EASA?	2	A central register as well as interoperable national registers will serve the purpose. EASA will follow the mandate of the new BR.
144	You have recognised that the real issue is the carrying of cameras on drones. Why not just deal with these devices and maintain status quo for traditional model	2	Drones will not carry camera only but they can be used for all kind of applications. So this limitation could not be considered
145	When (and how) will EASA commence physical testing of drones and possible collision with aircraft (as a follow up to the EASA Task Force Collision Report)?	2	EASA has recently awarded a project aimed at establishing a plan of what needs to be done, also in term of physical tests, to have a reliable understanding of the phenomena of drone-aircraft collision. Testing will begin when appropriate funding dedicated to this domain will be available at EU level, so that the launch of a testing project to develop the above mentioned plan, or a part of it, will be possible.
146	The 120 m limit is too low for glider models using thermal lifts. Could a higher limit be proposed for model gliders?	2	Modellers may be allowed higher limits by means of the authorization issued to the model club they belong to (if the model club operates at higher altitudes) or if they fly in special zones where this will be allowed as defined by the national authority.
147	is there an absolute right of way for manned aviation?	2	Yes. The requirement UAS.OPEN.30 mandate that all UAS operating in open category must give the way to manned aviation

#	Question	Score	Answer
148	the radio equipment directive, EU RED annex1, is not applicable to "airborne equipment " covered by BR 216. how will this be solved?	2	The intention is that Directive 2014/53/EU (RED) and Directive 2014/30/EU (EMC) will be applicable to UAS the design of which is not subject to certification by the Agency. Concerning the UAS certified by the Agency, the intention is to modify the essential requirements for UAS (Annex IX of the draft basic regulation) in order to include into that Annex the relevant essential requirements coming from the two abovementioned directives. EASA would then be able to develop the necessary certification specifications so that the airworthiness approval covers the RED and EMC aspects.
149	Cat C3: what does prevent a C3 to fly away without any control of the operator and go from a desert to a crowded area?	2	In cat C3 manufacturer are required to design the system with technical requirements to prevent such malfunctions like a Lost link management system
150	Wouldn't it be easier (from safety perspective as well for implementation) to define general no fly zones, e.g around aerodromes by EASA instead by the MS?	2	Airspace management is a responsibility of member states. Compliance with article 12 will be checked by the inspection of member States to be put in place like for other disciplines
151	Does the current proposal include an unfettered right of way for manned aviation?	2	Yes. The requirement UAS.OPEN.30 mandates that all UAS operating in open category must give the way to manned aviation
152	How about the old UAS that they dont have transponder installed they will have limitations in their operations?	2	Such UAS may continue as homebuilt under sub-category A3. Alternatively, if mass produced, the manufacturer can obtain a CE marking for class C4 and operate in sub-category A3. Of course limitations of sub-category A3 must be respected.
153	With regards to privacy, why is EASA concerned about public acceptance?	2	Several comments in this respect have been received and the concerns have been raised by DPO's.
154	Is there anything about the airworthiness certification?	2	Airworthiness or better said design requirements is covered in the appendices of the NPA for open/specific. For certified category, CS will follow.
155	How will be addressed the "national flexibility" applicability when will come in force the repealing of the law 216/2008 planed thru the com613/2015?	2	National flexibility will be provided by the system of Zones of article 12
156	Has the approved operational declaration unlimited validity?	2	It will be linked to the operational conditions. Timely validity can be discussed.
157	If the pilot has no state license he is solely bound to his Labour-relationship with his employer and cannot take decisions pro safety contra employer...	2	Point noted
158	To have a view on the needed NSA effort, Which are the aprox number of UAS operations expected under each group declared/authorized/LUC?	2	This will depend on the definition of standard scenarios. Please refer to the reply to the question n. 75 "Is there any estimation of the number of authorizations/declaration/Luc operations.....?".

#	Question	Score	Answer
159	Even to a professional user of UAS - SORA seems a rather complex methodology. Does EASA foresee an explanatory material, learning-tool on how to use it?	2	At the moment EASA does not foresee explanatory material but this may be taken into account, depending on comments received on the NPA. In any case, operation according to standard scenarios will allow to avoid the direct application of the SORA.
160	Who will choose what Standard Scenarios will be? EASA? NAAs? Industry? And what factors will be used in the process?	2	In accordance with GM1 UAS.SPEC.40 "Standard scenarios may be proposed to the Agency by competent authorities, by UAS operators, by manufacturers or by standardisation bodies". Multiple sources will therefore contribute to the definition of priorities. Choices, when necessary, will be operated by the Agency in collaboration with all stakeholders
161	How, starting when, by whom, within what context, and within what timeline will standard scenarios be produced?	2	In accordance with GM1 UAS.SPEC.40 Standard scenarios may be proposed to the Agency by competent authorities, by UAS operators, by manufacturers or by standardisation bodies. Standard scenarios will be defined with multiple means (JARUS WG6, national scenarios proposed for adoption by EASA, workshops of experts). Work has started in JARUS. EASA intends to carry out a consultation for adoption of standard scenarios by beginning of 2018.
162	What portion of specific category is foreseen to be covered by standard scenarios?	2	Standard scenarios may cover low and high risk operations.
163	In what languages will the SORA be available? And when?	2	A first version of SORA will be available in July on the JARUS website and a second version in December, still on the JARUS web-site. JARUS publications are in English. When formally adopted by EASA, SORA like all other AMC will be published in English
164	Could be SAR operations (through a standard scenario) a leading activity (like HEMS for manned aviation) in order to develop entire unmanned aviation world?	2	We should remember that State Operations are excluded from having to comply with the basic regulation (and therefore the EASA rules) unless they wish to opt in. On this base, the need for a standard scenario for SAR operations does not seem a priority.
165	Majority of operators are small operators/ sole traders. LUC discriminates against the majority of operators, if they are not eligible for this scheme.	2	The current regulation for manned aircraft already allows organizations to have some privileges (for example to approve own development flights) only if they are able to comply with defined organizational requirements. However an Operator which is not in the conditions to have a LUC can still operate under the specific category (as Operators with LUC in fact do) carrying out a risk assessment or operating under a standard scenario
166	Beside approving the Operators own SORA will there also a possibility to approve SORA's for other Operators?	2	No, the LUC privilege is only valid for its own operations
167	a group of operators constituting a legal figure (association) could apply for a LUC that cover all the operators?	2	Yes, considering that the self authorization process allowed by the LUC must take place within the management system and organization of the legal person that owns the LUC.

#	Question	Score	Answer
168	Repeat: What are the proposed Remote-pilot competency online training subjects or learning objectives? will it be included in Part-FCL?	2	Regarding the training subjects or learning objectives for the open and specific category, see answer to question 17. Regarding the training subjects or learning objectives for the certified category, this will be regulated in the drone regulation regarding the certified category. The NPA for this regulation is planned first quarter 2018
169	Registration data for open category is carried out by MS. It is expected MS share the info, or to operate in different countries you another local registration?	2	Interoperability and access to data is needed.
170	The Drone rules will take into account the specificity of drone lighter than air (Airship)	2	The limit of MTOM 25kg is not adapted to airships. Comments and suggestions are welcome
171	Existing regulations are unenforceable. How will the NPA improve this?	2	Please see reply to question 132
172	Please indicate / discuss if NAAs are required to derogate from the minimum heights for the operation of UA below 500 feet (SERA.3105 Minimum heights)	2	The adoption of the UAS regulation may be considered as the authorisation to be granted under SERA to fly below 500ft.
173	How will specific competence be defined? An online test only covers theoretical elements, yet the practical element is not covered, and this is the real risk	2	See answer to question 5
174	How can we trust in LUC good practices (autoauthorization, training) in a new system, where there is not enough data to determine the maturity of the operators?	2	In order to obtain the LUC, the operator organization, management system, processes and practices will be first scrutinized by the Authority. After having obtained the LUC, any deviation from terms of approval or from the application of the approved management system may lead to LUC revocation
175	Who is eligible to give a Remote-pilot competence online Training, (Authorized Training Organization) ATO?	2	See answer to question 95 and 120
176	The safety promotions are good to do. Will there be promotional campaigns to familiarize drone operators with the approved drone regulations once done?	2	this will be needed and requires coordinated effort of EASA, member states and associations.
177	How the Remote-pilot competence online Training Will Look like? What are the proposed Remote-pilot competence online training subjects or learning objectives?	2	See answer to question 17

#	Question	Score	Answer
178	If the drone industry supposedly has the potential of several billion euros - why does the industry not fund the necessary testing?	2	The expectation is that testing, with regard to ground and air collision, would be financed by public funding, in coherence with the fact that public interest is at stake and that the "air collision risk" affects not only drone industry.
179	Should the assessment of competence and training be made more defined, as this is a primary aspect of safety.	2	Having carried out the Impact Assessment, the Agency has the opinion that competence and training has been adequately assessed
180	A rules to protect drone a jamming or spoofing attack(c2 and gnss)?	2	The NPA does not propose specific measures to address cyber security, on the ground that it is easier to buy a drone that to hack one. Of course this approach will need to evolve when the more sophisticated steps of U-Space are implemented or when larger certified drones will be introduced
181	Establishing European rules for UAS is certainly a significant and important step. How is EASA ensuring that the rules will be harmonized with the FAA?	1	Through cooperation in international bodies (ICAO, JARUS)
182	What easa think of counter-uav(Battelle or hexagon etc)?	1	This is out of scope of EASA
183	The open category contains three different sub-categories with 6 additional classes. Is it worth to differentiate so much, where is the safety risk to do so?	1	This regulation should take care of the need of different stakeholders (professional and leisure users, toys, model etc..) and provide tools useful for all EU Member States to be able to apply a regulation in a way that meet their needs. For this reason we created 3 subcategories and 5 classes.
184	Can the competent authority (CAA in UK) remove some of the NPA proposals if as they see fit? (AMC1 UAS.SPEC.20 )	1	Yes, it is possible in the context of registration of model aircraft. They may decide for example to ask only for operator registration
185	Will there be a standard scanario for aeromodelling and if yes can the EMFU contribute to it ?	1	Yes there will be but for the operations of large model aircraft. EASA already discussed this possibility with EMFU
186	Dear EASA team, Projects as Skyways are currently in development to provide demonstrator. Which kind of involment EASA is going to take for such a project ?	1	EASA is exploring possibilities of cooperation both with Airbus and the Civil Aviation Authority of Singapore
187	Nice to have a European Legislation but why not a " ICAO " Pas Licence?	1	This NPA is not proposing any license for remote pilots operating in open and specific category. ICAO RPAS licence will be taken into consideration when developing the NPA on certified category
188	FAA make distinction between model aircraft within UAS category, everybody does, why EASA should not be able to it ?	1	FAA makes a distinction between recreational and commercial activities while EASA does not. EASA also recognizes that distinguishing model aircrafts from other recreational drones was not possible by means of a definition of "model aircraft".

#	Question	Score	Answer
189	What is the regulatory basis for drone training?	1	<p>The regulatory basis for drone training for the open category is in UAS.OPEN.40 and UAS.OPEN.60 the online training as well as an online test will be done in a manner and format established by the Agency.</p> <p>The regulatory basis for drone training for the specific category depends on the outcome of the SORA</p> <p>The regulatory basis for drone training for the certified category will be regulated in the drone regulation regarding the certified category. The NPA for this regulation is planned first quarter 2018.</p>
190	What accepted standards are out there (national or international), and how universal would a drone training product be?	1	For the different training within the EASA Member States, please consult Appendix V of the Impact Assessment.
191	What license levels exist?	1	See answer to question 17
192	What is the approximate amount of material needed (learning material and question-wise) to cover all learning objectives of the UAS Training Standards?	1	See answer to question 168
193	UAS.OPEN.40 in Subcategory A1/(b)/3 5 megapixels (MP) camera is a very low requirement, taking in considration that everyones phone camera is over 16mp....	1	drones maybe equipped with higher resolution camera but just need to be equipped with E-identification
194	Hello EASA team. Are the specificities concerning Lighter Than Air (Airship) drones taken into account ?	1	the limit for the open category has been expressed in terms of mass which may not be well adapted to airships. Comments are welcome to what could be an appropriate limit for airship
195	What is going to happen when U space becomes active with the old UAS that they dont have (EI) Electronic Identification?	1	As for previous technology changes there will be transition periods and retrofitting as applicable
196	Is there going to be something similar to the ETSO-C145 in aircrafts for drones (at least for some kinds of operations)? YMO: GPS using wide area augmentation system (WAAS))	1	For open category operation certification of equipment is not foreseen
197	FAA make distinction between model aircraft within UAS category, everybody does, why EASA should not be able to it ?	1	FAA makes a distinction between recreational and commercial activities while EASA does not. EASA also recognizes that distinguishing model aircrafts from other recreational drones was not possible by means of a definition of "model aircraft".

#	Question	Score	Answer
198	What is the position about the High cost risk of drones ingestion in engines that could cause major repair that could engage several million euros cost?	1	The NPA identifies safety barriers to reduce to the lowest possible the possibility of an impact of a UAS with another aircraft.
199	The NPA & the Blueprint are only available in English, a language that not every drone operator masterize. Do you intend to provide translations?	1	The implementing rule will be available in all European languages
200	The " Explanatory Note" of 22th August 2016 is a "soft-law" document, wouldn't it be better if this document was made legally binding for EU member States?	1	The purpose of an explanatory note is to provide the rationale for the NPA. As such it can't be binding
201	U-space: What is vision for the professional home made (small manufacturers) drones?	1	They shall follow the regulation and implement the related solutions. Separate modules providing functions (such as e-identification, fcs with geofencing etc) could be developed and made available on the market
202	What about kites in U-Space? Does EASA envisage to regulate also the use of kites by children?	1	The new Basic Regulation will exclude all tethered aircrafts heavier than 25kg, including kites
203	Will there be a maximum weight limit for the specific category?	1	The intention is to express the delineation between Specific and certified by listing specific high risk operations or in relation to the outcome of a risk assessment
204	The different Categories address certification of aircraft and operators. What certification applies to associated infrastructure?	1	Infrastructure related to the U-space will be addressed in applicable regulation. The operation authorisation for the specific category will include safety relevant ground and communication equipment.
205	How can the competent authority suspend or revoke an authorisation for the Open Category, when no requirement exists for an authorisation?	1	There was a deliberate choice to allow operations in open category without an authorisation. Open category is where hobbyists will operate. The sheer number of hobbyists would make unrealistic to issue authorisations. However, the authority can revoke the pilot competence certificate. Enforcement measures such as fines or other sanctions will need to be put in place.
206	to make the system work, do you agree that synchronized rules on operations, rules of the air and services, as a minimum, shall be developed?	1	We agree that the rules should cover the whole scope of UAS. The operational aspects are covered by the NPA (among other aspects). We intend to work on SERA (standardized European rules of the air). Concerning services, we will wait for further development of U-Space
207	What about my own use in flight to survey over my own properties ?	1	You will have to follow the regulation for the airspace and the one resulting from the NPA as it applies to both commercial and non-commercial activities.

#	Question	Score	Answer
208	The 120 m limit is too low for glider models using thermal lifts. Could a higher limit be proposed for model gliders?	1	Modellers may be allowed higher limits by means of the authorization issued to the model club they belong to (if the model club operates at higher altitudes) or if they fly in special zones where this will be allowed as defined by the national authority.
209	How does the 5MP camera limit fit into the risk based approach you mentioned?	1	It is privacy risk based
210	EVLOS is defined as "observer situated within the line of sight of the remote pilot" : this should be rather "UA should remain with x km of an operator"	1	The distance from an operator does not necessarily determines that the UAS is in VLOS, it depends on meteorological conditions, on the dimension of the drone, on its shape / colours, ... and other factors. It is responsibility of the pilot (not the operator) to keep it in VLOS.
211	I didn't hear any consideration about the safety issues regarding a drone electrical power failure? What does EASA think?	1	Electrical power failure is one of the possible failures leading to a loss of control of a drone. For each class a list of technical requirements, defined in a performance based approach, have been introduced to improve the reliability of the systems on board of the drone. Standards will now be developed to better details this requirements and they will cover the individual systems of the drone.
212	Bonjour,Il serait souhaitable que toute personne qui achète un drone de loisirs ou professionnel, signe une charte de responsabilité afin d'être référencé.	1	Signing a chart of responsibilities is not envisaged by the NPA. Operators and their drones will have to be registered with some exceptions
213	Suite de la question 1:Ces personnes auront obligation de faire 3 journées d'initiation au Télé-pilotage par une organisme ex: TECHNI DRONE	1	The NPA does not envisage practical training
214	Quand sera mis en application le théorique dédié aux DRONES ?	1	The rules are intended to enter into force 2 - 3 years after adoption
215	Currently the candidates for Tele-pilot professional go through the theoretical ULM	1	Noted
216	En France, quel organisme sera chargé de valider et de délivrer un certificat "pilote de drone"? Ce certificat ou diplôme sera-t-il reconnu au niveau européen?	1	The certificate of competence will be issues by the National Authority and this certificate will be recognized Europe-wide
217	So my scale Spitfire model will have to display an image of a 'drone' (C4) and an EASA registration number? Is this proportionate regulation of model flying?	1	We would like to clarify that the scale Spitfire will have a CE applied on it (directly be the manufacturer) only if bought on the market. If home built it will not. We confirm that registration is required unless where specifically defined in the rules.
218	The majority of drone operators are individuals operating on a self-employed statute (which can be recognized as legal entity)	1	This NPA takes into consideration also this kind of operators.



#	Question	Score	Answer
219	is there a difference to operating in Open category close to people and with a LUC in congested areas??	1	The main difference is that the Open category allows this kind of operation (in subcategory A2) without the operator having previously acquired any kind of certificate related to its organization.
220	What, if any, is the "auditing process" for LUCs once they have been approved - or can they "simply operate as long as nothing happens".	1	A compliance-monitoring function must be identified to carry out the auditing process to the LUC holder. The audits and inspections should be carried out by personnel not responsible for the function, procedure or products being audited. as per AMC1 UAS.LUC.30(b)(4) Compliance must be check with respect to(1) the privileges of the LUC holder, the risk assessment, and the effectiveness of the related mitigation measures; (2) OMs, logbooks, and records; (3) training standards; and (4) management system procedures and manuals
221	What, if any, is the "auditing process" for LUCs once they have been approved - or can they "simply operate as long as nothing happens".	1	repeated
222	The LUC seems to be similar in concept to the FAA Certificate of Authorisation (COA). While there are differences, is this a reasonable interpretation?	1	The FAA releases the COA to an operator for a specific UA activity (operation) while the LUC does not refer to a specific operation
223	Will EC 376 be applicable to the complex operators?	1	Article 3 of the cover legislation requires operators to comply with this legislation
224	If based on a standardised process will EASA oversee this standardisation or some other body?	1	Like for any other discipline, EASA has put in place a system to oversee how regulations are being applied in MS, and that will also be applied for the LUC
225	Notified bodies and qualified entities are subject to same criteria (independence; technical competence; integrity; etc.). Rules should establish equivalence	1	Notified bodies and qualified entities have similar requirements however are used for different purposes. They may require different technical competences. So the equivalency is not automatic
226	Can you elaborate more on the sharing of MAs best practices in safety promotion via ECAC? when will it start? and will outside-ECAC communication be ensured?	1	a survey of ECAC member states has been launched. This will help identify the most active States and organise a workshop that will helps define a European safety promotion campaign
227	Wouldn't rules about charges ensure a level playing field?	1	Charges to be levied by EASA will be defined by EU rules. Charge to be levied by member States for the activities they are responsible for will be defined by the member States
228	Why not come up with some questions that are actually relevant to the modern world for ATPL exams instead of using sly tricks in questions to catch people out?	1	Noted
229	Why are you called EASA - when you don't care about Safety but making profit?	1	Not agreed

#	Question	Score	Answer
230	Here's what the humanitarian sector has been putting together - <a href="http://uaviators.org/docs">http://uaviators.org/docs</a>	1	Thank you for the information
231	Why is does the UK CAA not have a .gov website, because they are a company? For profit.....	1	Not related to the EASA NPA
232	LOL keep removing my questions I am not bothered	1	N/A
233	I will not stay coordinated. That's not how requirements capture works. It is a complex task, but is one EASA needs to do.	1	Question/ statement not understood. Purpose of the workshop is to receive comments/ questions on the NPA and its Impact Assessment. We are not trying to capture requirements.
234	Are these rules new or are they a consolidation if regulations from EU countries?	0	The NPA proposes a completely new regulation that will be valid across the EU Territory. The NPA was developed with the help of an expert group including Member States, UAS community, Manned Aviation Community and Model aircraft Community. The concept of operations is based on the one developed by JARUS (Joint Authorities for the Rulemaking of Unmanned Systems)
235	Is EASA working with Airbus to create some legislation to enable UAVs integration into the non segregated air-space?	0	Yes, EASA is collaborating with the industry, including Airbus, as well as other bodies, in order to define the best framework to allow UAVs' integration into the non segregated air-space
236	Should there be a requirement for all model flying sites to be identified on a NOTAM map, rather than the burdensome registration of each individual aircraft?	0	Registration of each individual model aircraft can be avoided if the NAA establishes that it is possible to do so, as per AMC1 UAS.SPEC.20
237	How does EASA envisage the future of the proposed open category in the U space environment?	0	EASA is fully involved in the development of U-Space and the NPA provides the foundations for the main elements of it (registration, identification and geofencing)
238	How has EASA established that the potential impact on manned aviation of the C4 and privately built categories are acceptable?	0	UAS in this subcategory will be required to fly below 120m and respect no-drone zones, in particular those that the MS will create close to airports. The number of manned flight below 150mt (VFR limit) is reduced and as additional mitigation we have 30m margin (maximum height 120m). Mandatory online training will provide the necessary awareness of the risk
239	Because of John Taylor v. FAA ,model aircraft not being required to be registered any more in US. Is this case have impact on EASA policy of drone ?	0	US legislation is different from the EU one. The NPA provides high degree of flexibility for model operations. In particular Article 14 allows member States to issue an operational authorisation to model clubs and associations in which they can deviate from the provision of the regulation. In addition a dedicated acceptable means of compliance (AMC1 UAS.SPEC.20 Registration of model aircraft) has been developed, clarifying that a Member State can define deviations also in relation to registration requirements for aircraft operated in model clubs and associations

#	Question	Score	Answer
240	Good morning everyone	0	N/A
241	What about night flights in open category are you considering to be allowed if UAS is equipped with anti collision lights within 50m range from operator?	0	Night operation is not excluded but the UAS will need to be equipped with lights according to the operation
242	How about the privately built model aircraft & UAS are they need to pass through airworthiness inspection so they can register?	0	No, privately built UAS do not have to pass any AW inspection, but must operate in the appropriate category and within the appropriate restrictions
243	Please let us know what is your opinion about Fpv racing Quads as we all know they don't fly VLOS is there an option to fly with Visual Observer next to Pilot?	0	The proposed solution is possible. In fact according to UAS.OPEN.30, the alternative is that an observer situated within the line of sight of the remote pilot maintains the UAS in VLOS; clear and effective communication shall be established between the remote pilot and the UA observer. Another option would be to operate in the specific category with a net properly installed to fully address ground and air risk
244	Why is there not any minimum reliability objectives on functions contributing to safety: example : height limitation or geofencing?	0	We propose for the open category not to use the classical certification approach. We identified some technical requirements and operational limitations to mitigate the safety risk. These are contributing to meet the safety objective.
245	Why geofencing is not required on C3? It would guarantee flight remote of population.	0	C3 can operate only in areas that would pose low risk to third parties. MS will define zones where geo-fencing is mandatory and in this case only C3 drones equipped with geo-fencing can operate.
246	What is the date of availability of Sora with the appendices enabling application? Today missing meaning of low, medium, high objectives for example.	0	Please see JARUS website, by end of June the SORA body will be available in a version which already allows application for competent bodies. By June 2018 at the latest the JARUS website will host external consultation for the Appendices.
247	What is the expected impact to the proposed rule of U-Space?	0	The appendix 7.1 of the NPA defines the differences with the U-Space blue print. The U-space will support the principles defined in the NPA
248	How about the commercial users they need different training standards i.e. an event aerial photographer vs Precision Agricultural... What's your opinion?	0	Commercial users will fall into the specific category and there it depends on the outcome of the SORA what will be the training requirements
249	What will be the pilot training required to conduct operations in specific category?	0	The necessary pilot competencies are defined by the risk assessment
250	What will be the requirements applicable to RPAS autonomous operations?	0	Autonomous operations are allowed only in specific category (and in certified), therefore for them the full subpart B applies.
251	How does EASA think it can protect the PIC and his UAS against people attacking the Pilot or shoot down the UAS. Is this going to be dealt with Aviation Law?	0	This is out of aviation law and covered in existing laws to protect aviation

#	Question	Score	Answer
252	Why does EASA grant relaxations in field of GA (lighter better) but for drones the concept of proportionality has not been applied as JARUS proposed it?	0	The NPA is applying the same concept developed by JARUS. For the open and specific category a proportionate approach has been proposed through the subcategorization.
253	How, by whom & when will the standard scenarios required for the specific category be developed?	0	already answered
254	The "Notice of Proposed Amendment to the rules" are often used by EASA to show its legal opinion, but is today this legal instrument the most effective to use?	0	The NPA is part of the EASA rulemaking process
255	SESAR funding for demonstrations: what are the topics of interest and when will the call be launched and when will the contracts been allocated?	0	We suggest the you monitor the related SESAR webpages ( <a href="http://www.sesarju.eu">http://www.sesarju.eu</a> )
256	How does 'do not make modifications' work with software patches? Will a new certification be required for every bug removed? (as is the case in the Netherlands)	0	The NPA define a general principle in Annex II MKR. Guidance should be developed.
257	How & by whom have the topics of the SESAR calls been decided?	0	This question should be addressed to SESAR JU
258	Is the 120 m limit applicable in mountainous areas where many manned sailplanes/hangliders often fly below this height?	0	Yes, it is.
259	Does Easa want a European legal harmonization on matter of drone's use or does Easa want to preserve different legal rules on force in the various EU States?	0	The objective are harmonized regulations with adequate flexibility in implementation
260	Notified bodies and qualified entities are subject to same criteria (independence; technical competence; integrity; etc.) Rules should establish equivalence	0	Notified bodies and qualified entities have similar requirements however are used for different purposes. They may require different technical competences. So the equivalency is not automatic
261	What level of pilot competency assessment is proposed for the open category?	0	See answer to question 3
262	There already exist some Drone Op management systems which are quite advanced (eg: CQ Net). Have the U space team looked at these for ideas?	0	Not sure what CQ Net is. Could you please kindly provide some additional info
263	Do you forecast to make some "call for demonstration" in order to evaluate electronic equipments to improve flight safety not related to the airspace?	0	This should be done in the context of U-Space or local demonstration
264	What are the proposed different types of UAS Pilot licenses?	0	See answer to question 17

#	Question	Score	Answer
265	Reasonably expectation of nous uninvolved périple: is an action expected to be done by the UAS operator ?	0	Yes. The UAS operator will be required to make sure that in the area he is going to operate, it is expected that no person will be present.
266	Reasonably expectation of no uninvolved people : is an action expected to be done by the UAS operator ? (YMO: identical question)	0	Yes. The UAS operator will be required to make sure that in the area he is going to operate, it is expected that no person will be present.
267	With all potential users in the Open Category, how will the NAA's resource oversight for all these operators?	0	No oversight requirement for NAA in the NPA for open category. A very important role will be played by local authorities (e.g. police).
268	Will existing standards be taken into consideration in the drafting of the standardization mandates?	0	This is a reasonable assumption
269	Is there any process to change the mark assigned to each drone. I mean if I have a phantom with an initial mark C2, is immediate to change to c4	0	The technical requirements for C4 should be met
270	What is the manufacturer who deliver their aircraft in several compatible product groups? Are These Homebuild Aircrafts?	0	Question not fully understood. Could you provide further information
271	Pensez-vous imposer aux constructeurs de drones, la mise ne place d'un transpondeur pour les missions professionnelles, simplifiant les autorisations de vols ?	0	Surely this will be useful but it comes with some cost. The Transponder is one of the possible solutions. We are investigating also other possible options.
272	Do you think it imposes on the manufacturers of drones, the setting up of a transponder for the professional missions, simplifying the authorizations of flights YMO: Identical question)	0	Surely this will be useful but it comes with some cost. The Transponder is one of the possible solutions. We are investigating also other possible options.
273	I have read all thw NPA and i did not find anywhere mentioning professional or hobbist.... ?	0	In light of the risk based approach, we decided not to make distinction between commercial and not commercial operations. Mitigation measures should be the same independent of the nature of the operation and be based only on its risk.
274	Why c4 does not need e identification ? There could be infringements to be investigated and they are the biggest ones.	0	C4 UAS may be operated only in remote areas where risks are low. Still they need to register and display the registration number on the drone. In case it will be used in an area where the e-identification is mandatory, the UAS have to be equipped then with an e-identification system
275	We would like to take part in the debate on this platform but it seems impossible or how to do it ?	0	N/A
276	In the case of BVOL operations, what is paragliding, gliders, etc. that can fly into this airspace?	0	Question not fully understood

#	Question	Score	Answer
277	Drones provide a huge range of new machines and types of operation. What will be covered by standard scenarios? How often will they be updated and published.	0	Standard scenarios will cover scenarios with low and high risk that are considered of particular interest for applications by all stakeholders, including in particular operators and NAAs. The number of adopted standard scenarios will increase gradually, at the moment it is not possible to define exactly how often, but the Agency may consider to hold a consultation on group of scenarios and not on single ones.
278	Will SORA and Standard scenarios mean operators do not understand risk assessment - and only tick boxes.	0	Standard Scenarios will give the possibility to Operators to put in place the mitigations means defined by the standard scenario without having to identify them upfront. Therefore, in extreme view, "to tick boxes", under Operators' responsibility.
279	If LUC is universally accepted across the EU without further assessment, does the same rights/ privileges apply to the specific category operators as well?	0	GM1 UAS.SPEC.80 explains how mutual recognition in the specific category takes place. The Operator must check that local conditions are still coherent with the risk assessment. Moreover both Authorities must be satisfied with the risk assessment before the operation can take place in a MS different than the one of the principal place of business of the operator.
280	How will one country understand local risk issues in another to assure safe operation under a LOC. How will the approval MS be held to account for problems?	0	The process leading a MS to release to an Operator the LUC must be such to ensure that the Operator is capable of assessing whether local conditions in a country different than the one that has issued the LUC are such that an Operation falls or does not fall under the terms of approval of the LUC. The process requires that UAS operator is found to comply with UAS.LUC.20, UAS.LUC.30 and UAS.LUC.40. The terms of approval shall include the UAS operator's privileges, authorised activities and operational limitations, as appropriate.
281	Considering the nature of complex operations and requirements put on organizations (sms) shouldn't this not just fall under the certified category?	0	The terms of approval of a LUC cannot be such to allow self approval of operations whose risk is so high that they would be classified as operations to be carried out in the certified category.
282	Are the Member States supposed to supply data on no fly zones? If not, who?	0	Member States are expected to define "no-fly zones" and provide the data
283	How can an ATO/ DTO issue a licence as just stated, this is the remit of the NAA. Should they only just issue the recommendation report/ assessment results?	0	See answer to question 53 Next to that an ATO/DTO will only provide training, never issue a license.
284	Will the regulations be easy to understand for everyday users? Already answered that - no Due to this it will have absolutely no effect to the current situation	0	there do not seem to be a question