Question 1: Do you agree with the challenges with operational requirements identified by stakeholders, and why?

Yes, the CAA is dealign with a lot of issues. I do not believe in the penalisation of law-abiding flyers, however, I believe more efforts need to be done by the CAA and manufacturers in education, perhaps a deposit upon purchase and finalisation of sale when tests (need to be cheap for accessibility), much like can be done via the Flyer ID (but a bit more substantive as the Flyer ID test is lacking. Alongside the successful completion of the test, and understanding of the law in regards to UAV flying, then the sale can be completed and the customer is provided their Operation and Flyer ID. Streamlining the process, ensuring education, now stopping responsible flyers but stopping the unsafe UAV use which is predominantly from new flyers often with no knowledge of the rules and haven't seen there are any.

Question 2: Should CAA adopt the following policy objectives for operational requirements and why? Mitigate safety and security risks; User-centric; Enforceable; Growth enabling; Scalable. Please describe any other objectives we should consider.

Yes, but enabling, accessibility and equality needs to be core. Ease of access to cheap but capable drones is a good thing, but has unforeseen consequences. I myself have only been flying a sub 250g drone for a year now. I spent 6-12 months prior to being able to afford it getting accustomed to the rules, legislation, sources of information etc. However, the CAA and its constant changing of the rules and lackluster in providing this information to stakeholders and the public is shameful. How can we penalise people for not following rules when it is changing and shifting on a very regular basis, there is no streamlined way, the CAA has a database of emails for those who have signed up getting an Operator License. So therefore, a newsletter about law changes, issues faced, etc. is quite simple and easy. I would make it a monthly batch email to ensure it's not considered as spam, with a clear contents page to ensure those with less time can skip, it could also highlight especially important rules not being followed or issues recently being found, reminders or even law changes in bold at the top of the newsletter.

Question 3: Do you value international alignment in operational requirements, and why?

Yes. How is this even a question. We live on planet earth, not planet Britain, so international alignment and somewhat compatibility is of the utmost important, it would be good to get close with key countries like the US and Europe so it's easier for the CAA to also provide information to British citizens if they are moving or going on holiday and find resources to allow such a transition, perhaps a website with lots of resources, information or a section on the newsletter I aforementioned. More countries can be included where there is large movement of British citizens either in terms of holidays or moving, or drone use across them. Like a database of knowledge, mostly about the law in our country but perhaps including where to find out more information about commonly asked for locations British citizens go to and will likely want to bring their drones. With this sharing of knowledge the same can be done for citizens of other nations if they want to bring their drones here, how to let them know what needs to be done, how to go about it, sign up etc.

Question 4: Should CAA re-name operational categories and sub-categories (Opportunity 1) and why?

Yes they should be renamed to make it easier to understand, I having been educated in the categories still need to intensely think to 'translate' it into understandable language for me to understand. I think it should be renamed based on risk, but also something to make it clear what it's referring to, such as 'away from people' or 'in the midst of people'.

Question 5: Should CAA simplify how operational requirements are categorised (Opportunity 2) and why?

Yes, it needs to be simplified, also appraised based on actual risk. Such as the sub 250g drones are very low-risk to people and aircraft. So how is greater restrictions on the sub250 being thought of, it needs careful

thought to stop people purchasing drones in the sub250g category and flying unknowingly breaking rules thinking 'it's just a toy'.

Question 6: Should CAA update how model aircraft operations are regulated (Opportunity 3) and why?

Yes. I don't know as much about model aircraft, but surely in being petrol-powered, larger in size these should be restricted to locations away from people or specified zones with appropriate safety precautions taken such as cordoning it off from public within the flight path.

Question 7: Should CAA simplify exclusions from operational requirements (Opportunity 4) and why? Please describe any alternative exclusions that should be considered.

Yes it should. The use of the word 'toy' should not be used. I would think UAV with camera and UAV without camera. The UAV without camera would replace 'toy' especially for people who think a sub 250g drone with a camera is 'but it's a toy. We need to avoid using the word toy. Also again I would like to mention, we do not need more restrictions on sub 250g drones, I would increase the exemption weight to 500g but this being said, we need more work and intervention into education, courses compulsory licensing for those who purchase drones of any size. The course should be about the law, flight restrictions etc. should be compulsory, cheap, accessible and easy, though informative. Then when people flaunt the law there is zero excuse for not knowing and then punishments can be harsher. Sub 250g drones being used by responsible fliers have caused 0 issues. It's the fliers who are not following the law. So I am adamant that the lowest risk UAV users of the least risk drone which weigh less than if I threw my phone up into the air and it hit someone. So why penalise or add unneeded and terrible restrictions. However, it'd the link between new purchasers and the drone code. Also we need to make the drone code more simple and have it issued alongside each drone sale (not to mention the idea I had earlier for paying a deposit, getting a license then being able to pay for the rest of the drone.

Question 8: Should CAA change transitional arrangements for users of UAS without class marks (Opportunity 5) and why?

With the constant changes since Brexit I think it's an absolute requirement than from when finalised rules and class marking is made, we then need to ensure that there is a 5-year final transition period. It means anyone with a non-class mark drone has 5 years to upgrade, I think this is a reasonable timeframe, if someone purchased a drone a day before class-marking then they'd get 5 years of use from it, a good lifetime for the item, and then would be required to upgrade, however this being said, for new buyers sellers own drones should be forced to inform those purchasing of this transition period to ensure clarity and ensure customers can make an informed choice.

Point: Digitised risk assessment
Page in reference: 14
Comment:
It is paramount for the digitisation of risk assessments, I would also call for the digitisation and standardisation for applications to aerodromes for permission to fly within their airspace. Why? It is a misconception, it isn't their airspace! It is national infrastructure! Imagine Amazon owning the roads and being able to kick the public off national highways, or even getting them to apply for its use and pay to be able to use publicly funded roads! I am not saying everyone should be able to fly within airport airspace, if course not. I believe using the Drone Assist UAM functionality for drone users to apply for free for use of airport airspace and to be assessed for safety, of course we should prioritise the safety of manned aviation at all times. If a drone pilot applies to fly within airport airspace and is denied, it should be outlined why (for example too many flights within that airspace, or not feasible to direct so many flights around that area). However, airports shouldnt be able to deny airspace usage without good reason, and shouldnt charge pilots to apply nor admin fees for applying to use the airspace, why? This is because this should be the cost of the airports using national infrastructure and 'locking the public out'. I am not saying to deny safety of manned aviation but to open it up equitably, safely, fairly in a easy, standardised way that can be digitised and used

through the Drone Assist app. Also I would ensure the Drone Assist app substructure is helped to be a truly fully unified system for managing and planning flights, in the sub-500m airspace, perhaps with drone retailers be required to point purchasers in the direction of the Drone Assist UTM app, but also to ensure the Drone Assist UTM is made available for other apps to be able to use and integrate into their own unique applications, however the Drone Assist app to be the basis for managing people being able to plan flights, see hazards and other airspace users planned flights.

Point: Pilot Competency
Page in reference: 15
Comment:
I would like to add a comment saying I like the flyer ID test. I would improve it in a number of ways,

1) Make it compulsory for all drone pilots, as my earlier suggestion, a requirement to pass after paying a deposit for a drone purchase (ensure the deposit counts towards the payment of the drone itself, like a half payment)
2) Keep it a free online test to maintain accessibility
3) Keep it as a requirement to pass for getting a Flyer ID and also an Operator License,
4) Better use the test to test all different aspects of the law related to UAV operation.
5) Make it a multiple choice questionnaire
6) Every year when the Operator License expires, make the test need to be redone before getting another license for another year.
7) Also use the CAA list of emails when people register for an Operator License to remind people a week and on the date of the need to renew their Flyer ID and Operator ID and provide a hyperlink to the place to get the test. We need to make it easier for people to access to change the great lack in people who fly UAVs without registering, hence making their use of them illegal. Not everyone is proactive to do the research themselves, if we make it easy then anyone who refuses can be punished accordingly.

I would also like greater access and places where UAV pilots can complete the A2 CofC and GVC, I've been interested in both, but doing these courses are like £300+ each when I've found them, that is expensive, considering it's a third of my drone price, for a course. It makes it less accessible. Allowing more providers to provide the training and closer to home may help reduce the price and get more people complying and flying safely.

I totally agree with the need for the need of "a more comprehensive and scalable approach to training will be required to enable growth in more complex UAS operations" depending on the specifics that it entails. I do like the mention of RPC-B and RPC-A, I would ask for the names to be changed, A should be the basic form as its the one to be completed first, and B is the second as it's the more advanced, I would love to do both courses, I don't mind the hours of practice but it depends if it is cost accessible.

Point: Existing Regulation
Page in reference: 16
Comment:
I agree for systems to be put in place to avoid security and safety risks as it's not good to have it all in control of UAS users themselves rather than to be put into systems. However, this depends, it should be based on risk (risk actually being based on evidence), and be equitable, so for example with the sub-250g drones it should have the same flight airspace as current, there hasn't been issues with sub250g drones apart from idiots flying on football pitches or within airspace within a temporary NOTAM which both can be attributable to new pilots not bothering or knowing where to learn about the rules, or their existence, or even merely thinking of drones as a toy. This once was this case, but not anymore with their capabilities. It should be easy to unlock FRZs when permission has been granted by an airport after proper checking of safety associated risks. We cannot allow businesses to cordon off public infrastructure such as national airspace for their own use and profit. I am a massive fan and proponent of the Altitude Angel Project Skyways project to put the onus on businesses for they are the profit-makers, to ensure their automated BVLOS drones avoid conflict with manned aviation in addition to individually controlled drone flights by members of the public. The onus should be on businesses that seek to profit and have a lot of capital at their exposure, rather than limiting personal freedoms, nor giving the burden on the public pocket. It should be businesses who wish to profit to put the investment.

I both agree and disagree with UAS communication of ID data during flight. Remote ID in the US has been seen a travesty, someone can download the app, find where a drone pilot is and then they're a target of theft as they clearly have a drone. Much like what happened with Pokemon Go and people stealing phones as the key locations where well-known and could be staked out. I believe this information is useful to be collected but should be locked away without being viewable by anyone apart from law enforcement, and even at that point, they should only have access when they have reason to believe that a crime has been committed, much in the same way they cannot enter a person's house or collect their fingerprint or DNA data without consent from the person; reason to believe a crime was committed etc. I do have to say, I have concerns regarding UAS manufacturing regulations within the UK as will manufacturers wish to comply with a relatively small economic zone relative to the European Union; yet another reason for the failure that is Brexit. However, this isn't to say that we should allow companies to sell UAVs within the UK without some form of ability to adopt specific adherence to UK regulation. It wholly depends on how this is done, sensibly, fairly, equitably, based on evidence, and not being denied based on other commercial interests.

I believe the easiest and best way is to mirror the EU legislation as closely as possible, with any deviation to be slight, within within class markings much like the EU, but specific functions or requirements shall be easier to implement within the same 'class' comparatively between two similar class systems rather than a class system and totally different one.

Point: Stakeholder Feedback
Page in reference: 17
Comment:
To comment on the feedback from Stakeholders, the first point is true, but if it's done similarly to the EU class marking system with small tweaks as absolutely necessary, then parity can be achieved and more easily implemented.
Class marking may be confusing for end users, however, working with drone YouTubers, social media influencers, the CAA producing their own resources easily understandable and can even be distributed to UAV pilots through their collected emails via the registration process. A chart similar to that on page 17 of the Call for Input report could easily make the class system more easily understandable with specifications laid out without jargon in a visual manner and hence nullify any confusion about the class marking system and the relative restrictions placed upon each, (also important to add reasons for restrictions on each based on relative risk). Totally agree with the point about "Users are not communicated adequate information at point-of-purchase or product set-up on how to use their UAS safely and securely." This needs amended immediately upon the CAA finally making finalised and somewhat future-proofed regulations being put in place. This will mitigate most safety and security risks outright of which we currently possess evidence for. Most of which has been issues with new pilots lacking information regarding the rules, regulations and need to follow them, let alone the issue with the use and confusion of the word 'toy' which UAVs now do not fit within this category. An all-too-common misconception. Threshholds will always have some 'grey areas', however, what is important is to determine key points needed for each class, these key points shall define the class system and where every drone fits, other ancillary concerns can be presented back to manufacturers on a case-by-case basis. In terms of regulatory requirements, the main issue is educatio0n and communication. The CAA makes a lot of money from drone pilots via the Operation License fee, it is important for this money to be used for education, communication and getting feedback from the public regard the rules as the CAA is a regulator and hence must have a way for the regulated to get in touch with them and not merely rich corporate interests.

Question 9: Do you agree with the challenges identified by stakeholders relating to product requirements, and why?
I do agree with most of the challenges, however, most have easy ways to mitigate concerns as I have tried to point out in the immediate paragraph above.

Question 10: Should CAA adopt policy objectives for product requirements, and why?: Mitigates safety and security risks; User-centric; Growth enabling; Scalable; Internationally aligned? Please describe any other objectives we should consider.

I agree with all of these aims, we want safe and secure airspace, but it should be focussed on all air users, their ease and equitable lawful use, enabling them to make informed decisions when purchasing and flying, it should enable the market to grow *so long as* it also maintains the freedoms of everyone to access equitably the national airspace, the last thing we want to see is restrictions in the airspace, is we lose access due to corporate seizure then it'll be increasingly difficult to reclaim our national infrastructure such as has been the case with the countryside land, trains, schools and so much else. It should be scalable, when I talk of wanting a final set of regulations I do not mean they should be unchanging, but should be changed within increments such as every 5 years new technologies, risks and other factors be appraised and changes made. What I mean is we cannot live in a system where the rules are changing today, tomorrow and the next day, meaning no one can use the airspace, make purchasing decisions or anything else because the laws are very likely to change. Additionally constant changing to and fro makes the law seem meaningless, arbitrary and not evidentiary based. Again, I believe in the need for regulation to ensure safety and security but in a equitable, fair and evidence-based way, the constant changing of rules goes in total opposition to this goal and puts everyone else off of compliance for it being totally meaningless.

Point: Class Marking
Page in reference: 18
Comment:
I do believe that class marking based on some system of weight does make it easier for consumers, for example the use of a drone with attachments, however then isn't based on technological features. If it's class marked based on features then it can ignore add-ons to the drone. It's difficult but can be managed.

Question 11: Should CAA implement manufacturer standards (Opportunity 8) and why?
Of course, yes. Manufacturers should make products that are safe, legal and okay to use as is regulated in all other aspects of life. This should be no different.

Question 12: Should CAA implement a product labelling scheme (Opportunity 9) and why?
Despite the difficulties I outline in my "Point: Class Marking", I overall think the class marking should be based on the features of the drone, the drone's capabilities and ways it can maintain its own safety, such as return to home, obstacle avoidance which for myself are amazing and have been so useful, not infallible but so important and I hope they are features that are worked on more improving than any other features. As for add-ons, I think that add ons should also be classed, classed whether they are able to be used legally on a drone or not, for example some strobe lights, if they are not of sufficient quality standards then they shouldn't be fit for use on a UAV, however if it is then it can be marked to demonstrate as such.

Point: Exclusions
Page in reference: 19
Comment:
I agree that UAVs with weight less than 250g and no camera that are classified as toys should remain without regulation, but I would advise to be used only with parental supervision due to a number of risks potentially posed. As for non-toy sub 250g camera drones they should have minimal regulation, low risk due to weight being low, having to follow key legislation such as keeping safety at the forefront of every flight, not flying in FRZs and also not over crowds. I would agree not having to follow with Remote ID or geoawareness in the situation in which we currently live, however I would be okay with these issues if geoawareness kept equitability in mind with access to national infrastructure of airspace as I've outlined countless times. As for Remote ID I would agree with it being used in sub250g camera drones so long as it followed points I've mentioned earlier, such as the public not having access, and only access being allowed when there is suspicion of a crime being committed. For example a drone clearly flying in a FRZ then police can outline the specific area being flown in and request Remote ID data for all UAVs in the zone at the specified times, upon this the police can then follow up. However apart from this I don't believe Remote ID should be more overreaching. However, companies for example may choose to put tracking on all their drones and hence be remote ID compatible, however then these drones are likely to be over 250g anyway. As for point 3.13 I disagree entirely with this approach, I'd like to see the evidence made for this move, where are the police reports that have been substantiated? The reports of drones falling out of skies and

falling on top of unexpected passers by. I don't see any valid evidence apart from the odd occasion of an uninformed new flyer not being aware of the rules, hence this action being taken is overreaching, not proportional excessive compared to the risk. I've outlined in this paragraph among others ways to combat the issue of uninformed new flyers repetitively, mainly through education and a system to stop a UAV sale until a license and basic test being passed. As for remote ID I would only think they are relevant and proportional and evidentiary-based upon the situation and circumstances I've outlined within this paragraph, as Remote ID has been seen in other countries it is unsafe, overreaching and inequitable. I would disagree with sub-250g UAVs being equipped with remote ID or geoawareness as they exist currently. I am not in their disagreement if they were for example to be metered and evidence-based and fair as in this paragraph, and would agree for the same for other weights. Remote ID and geoawareness in the current system is inadequate. Pushing for their inclusion in all UAVs only spreads its inadequacy to all UAV flights rather than fixing the problem in a fair, measured and evidence-based, risk-based manner.

"In our decision making, we will consider how to mitigate risks effectively and proportionately, whilst enabling international alignment where valuable to do so." I hope this is done so, what is seemingly purported to be the intention mentioned in this document so far does not follow this line of thinking as I hope to have made clear, but also hope I've made clear how it can be fixed to introduce all of these useful features in a safe, fair way for all stakeholders involved. We have seen how some members of the public who are uninformed of drone rules, have taken it into their own hands to attempt to stop legal flights, so making completely public all UAV pilots' user location is dangerous for all involved. The police should have access to this, but only when a suspected crime has taken place, otherwise it's merely unsubstantiated claims being made based on little evidence of a crime taking place.

Question 13: Should CAA simplify exclusions from product requirements (Opportunity 10) and why?

Yes the CAA should, but again see the rest of my answers, it has to be proportional and relevant, so in the current way it exists remote ID and geoawareness should not be added to UAVs, especially lower-risk sub250g UAVs. See my above paragraph for ways in which Remote ID can be implemented fairly, in a previous point I mention Drone Assist and Altitude Angel's Project Skyways in which mentions a good system for geoawareness that is fairer and can work better and more flexibly, with the use and promotion of a unified system for air management as currently exists in a very basic form with the Drone Assist app, this should be an area of focus as most responsible UAV pilots already make use of this app to plan and coordinate safe flights alongside their knowledge of the Drone Code. It is about the CAA ensuring the rules are clear, communicated, fair, reasonable, proportional and based on evidence according to risk posed by the action.

Point: Remote ID
Page in reference: 20
Comment:
Again, I don't have a problem with Remote ID. So long as the public cannot access, also the police can access it when they have reason to believe a crime has been committed, such as the incident of smuggling mentioned in the report. In that case of course the police should then be able to apply to get that remote ID information. I'm not a fan of the CAA using remote ID data to see how flights occur in space, imagine the CAA putting chips in every UAV pilot, again not what is based on actual risk, it's data collection in an intrusive way without substantiated risk or reason. Remote ID in a way that doesn't follow what I've outlined will only encourage non-compliance hence making it useless regulation in the first place as it won't be followed, increases risk through the introduction of overreaching surveillance and hence does the opposite to the goal's intended outcome. The ways in which Remote ID could be introduced as I've outlined mitigates the reasons for non-compliance, ensures appropriate privacy apart from the case of malicious or incompetent illegal activity. Again I'm not against the data in 3.18 being transmitted, but only when a crime has been perceived to have taken place by authorities and I don'k the public should have this data, nor shouldn't the police unless they have reasonable suspicion of a crime having taken place to warrant their access to the information in the first place. In the way Remote ID is being discussed in this document it is angering me, and hence I'm providing reason and constructive feedback for why I think in the current form it is vast overreach and what can be amended to fix this.

Question 14: Should CAA implement Remote ID (Opportunity 11) and why?

No, not unless it follows the points I've outlined above. Data only accessible by authorities upon reasonable suspicion of a crime taking place. Also the public does not need access to this information. Plus the operator location especially should be kept hidden with the exception of a crime being committed for the safety of the UAV operator.

Question 15: Should CAA implement geo-awareness (Opportunity 12) and why?

Overall I agree with geoawareness, but so long as its equitable, fair, for example around airports and temporary NOTAMs, apart from this it should be freely accessible to make use of the national airspace while also following other regulations to ensuring every flight is a safe one. We do not want a system where government may excessively curb access by people to national infrastructure without fair, equitable and just reason based on safety risks. Please read the entirety of this response for many mentions of how this can be done in a safe and fair manner to allow fair compliance, and safety for everyone involved.

Question 16: Should CAA introduce requirements for manufacturers to provide user guidance during product set-up or pre-flight, via the controller or other interface (Opportunity 13) and why?

Yes. This is by far the easiest way to ensure legal compliance apart from making rules and regulation reasonable in themselves and based on actual risk and evidence. I personally think it should occur prior to purchase, please see my suggestion for the purchase of a UAV be on the condition of an upfront deposit (deductible from the price to be paid later), then a Flyer ID test to be taken and gained, Operator ID given with the passing of this Flyer ID test and registration to be done, leaflets regarding the regulations to be given and then the rest of the payment can be finished and only then the UAV could be purchased. This being said this process must be accessible, the course must be cheap much like he free Flyer ID test currently (though I think more should be added to this test to make it more comprehensive and related to the information in the Drone Code. I also think the CAA needs to do more in terms of education, informational resources and potentially work with influencers related to drones to inform their UK audience. I myself watched Geeksvana for half a year prior to purchasing my drone, and hence feel very well-informed, including having a copy of the Drone Code on my mobile phone at all times. I did this proactively, but if this is made more commonplace in order to validate the purchase of a drone (so long as it remains accessible and easy to attain subject to people completing this process, and it being clear the process as a whole and why it has been put in place) then it mitigates all the issues currently being faced, it's fair, based on evidence, reasonable and shall safeguard people in addition to the safety of the national airspace and allow flexibility for future airspace changes that we will see in the future, thus allowing tweaks as the current situation changes but done so in a reasonable way.

Question 17: Should CAA introduce user validation requirements on manufacturers (Opportunity 14) and why?

Please see answer to question 16 which encompasses the entirety of my views. In short the answer is yes. Manufacturers profit from the sale, hence it should be their responsibility for reasonable checks being in place. For example a car manufacturer will check someone's driving license to allow a purchase, and will likely check they can afford the product, UAV manufactures should be forced to make such basic reasonable checks considering they are making the profit in an increasingly profitable medium and hence should divest some of that revenue to ensure safe usage from the initial customer at the point of purchase which is where lies the biggest risk for safety and security, from new flyers, people who are likely not to know about the rules and regulations, nor have the incentive perhaps to make themselves well-informed.

Point: Policy and Guidance Documents
Page in reference: 23
Comment:
Related to point 4.1 I understand the complexity of regulation and the law hence having the different documents with the law related to the use of UAVs. However, for the public usage it is imperative that it is standardised, streamlined and made clear, the Drone Code is a good, though not perfect, document encompassing most of the rules within a single document in a quite clear manner. When regulation is finalised to a reasonable extent where they shall not change every 6 months or more frequently, then a similar document should be made, made public, distributed to all those with an operator ID, distributed to

drone-related social media influencers, and also on social media and Facebook groups of UAV pilot communities to ensure clear awareness of the rules and regulation in a clear, consistent manner. Additionally amendments should be made few and far between, and be minimal wherever possible to ensure they can be relied upon. It should also be made distributed to UAV pilots, especially considering the CAA has a database of emails for every registered pilot, this should be an easy mode of communication of key information related to all of those involved. It may also be good, to do TV campaigns or internet campaigns when possible to inform the public of basic UAV rules especially with many people who think any flight is illegal and have been some cases of altercations by the public on otherwise legal UAV flights. Again with point 4.2, in this combined document of the Drone Code rulebook, it should be clear, organised, comprehensive and I am quite sure would believe would fulfil the goal as outlined "make documents more suited to their users, and to minimise potential for duplication, interdependency, and contradiction. In turn, this should make it easier for users to comply with the regulations, whilst also delivering benefits for CAA, government and the police." I agree with the combining of areas and rules together to avoid duplication or confusion as outlined in point 4.3.

Question 18: Should CAA simplify policy and guidance document structure (Opportunity 15) and why?
See paragraph above, but yes. Simplified but clear, fair, reasonable and evidence-based on risk is better.

Point: Other Opportunities
Page in reference: 24
Comment:
I'm not against Fixed Penalty Notices for clear breaches in drone rules. However, small mistakes should be taken into account, for example the issue with knowing the height of a drone above ground, a controller tells the UAV pilot this, but not relative to ground but relative to take-off location, hence if someone takes off, on a hill and flys off the hill, it may very slightly be over the limit for flight but if all other safety and risk assessment conditions are being taken place then I don't think this warrants it. I think Fixed Penalty Notices are paramount for use when people are flying in clear breach of rules and flouting them, and it should be a hefty fine based on the offence. This may hopefully also again help compliance, again, so long as the regulation is fair, evidence-based, risk based, reasonable and not skewed to corporate interests. Again I don't disagree with Electronic Conspicuity and Detect and Avoid technology, but only for government areas for national security such as GCHQ, airports, perhaps large stadium events and temporarily for other events that may take place like festivals, however, bear in mind photographing a festival from a safe distance (aka not above crowds) then should be allowed as they are in this case legal, unless within an FRZ or temporary NOTAM. NOTAMs should only be granted when there is clear risk to health and safety, for example a laser light show, not merely a music festival unless it poses a risk to aircraft flying within the vicinity. UAV flight worthiness should be inspected at the manufacturer level and a government body should ensure checks that these are being complied to. As for UTM I highly promote the use of Altitude Angel's Drone Assist App as a basis, it provides information, users can log flights, people can plan around airspace, NOTAMs, physical objects in the airspace and more (though of course none of this diminishes the UAV pilot's responsibility to fly safely and avoid flights and objects in the airspace while looking out for them.
Regarding point 4.6 and to mention the alcohol limits for flights, this should be clearly outlined and put into a figure. I think it should match the drink-driving limit. Both UAVs and cars pose a threat when used irresponsibly, UAVs can fly hence greater risk for random passers by not next to roadways for example. However UAVs have systems in place to avoid obstacles and return to home, where cars do not. Additionally UAVs operate above people, while cars are on ground level where people also reside, and go on about their day hence increased risk. In addition, looking at mere statistics it's clear car accidents are more common. Of course, cars are also more common. However, I believe the alcohol limit for both should be matched. If one is to decrease, then the other should also. I believe a car driven by someone under the influence is unparalleled in how it's more dangerous to civilians than unmanned UAVs are. However for clarity, parity and fairness I think the alcoholic limit for both should be matched and remain linked.

Question 19: What other opportunities to improve UAS regulation, beyond those described in this Call for Input, would you like to see progressed?
Please see paragraph above. The main thing I want really considered is Drone Assist app to be made more commonplace, for all who plan on flying their UAV, I think this app should be considered prior to every

takeoff. Additionally and more importantly progress should be made related to Altitude Angel's Project Skyways and primarily paid for by businesses who currently or in the future hope to make use of UAVs in their own corporate structures hence alleviating government cost as much as reasonably possible so they also take ownership of the dangers that BVLOS and increased UAV usage by corporate entities shall impact air traffic management and hence should pay accordingly.