

20th February 2019.

Submission to Airways Corporation – Proposed Pricing Review.

Thank you for meeting with many of us during your regional consultation meetings. These were very helpful and it was good to meet directly.

AOPA – NZ would like to make some points regarding your review.

1. We agree that GA does not get as much value out of Airways services as commercial airlines and the alteration to GA fees in line with inflation is fair.
2. We are concerned that GA aircraft are seen as 'second class' citizens and requests for 'Controlled VFR' into airspace is often declined. This may be a safety issue as commonly the aircraft's only option is to descend and fly low level under cloud and in rain or fly in severe turbulence to 'remain clear'.
3. We were reminded in our discussion that when controlled airspace is not serviced by a controller it reverts back to 'G airspace' rules. We see this in regional airports when controllers are 'off watch'. It has come to our attention that from time to time some high level airspace is not serviced by a controller due to work force issues or lack of commercial airlines scheduled to fly in that area. We are always forbidden to enter this space. We would like you to investigate the practicalities of these gaps being NOTAM'ed or adjoining controllers informing us of the situation and allowing us to fly though under G airspace rules.
4. We are disappointed that your system does not allow a VFR flight plan detail to be displayed in front of the controller. These VFR flight plans have become just a 'sarwatch' time and as such their value has been degraded. The standard ICAO flight plan form used for domestic IFR has a "V" in place for VFR flight, but this has been disabled. Can you enable this feature for those who would prefer to file a full flight plan.
5. We note in your example that a pilot doing a number of circuits at a controlled airfield will have to pay for each landing and take-off. We were under the impression that a student only had to pay for one circuit and then the subsequent ones on the same day were not charged. We believe this appears fair and encourages pilot training.

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