

U-space Level 1



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Designation of U-space airspace level 1

- a. The designation of 'U-space airspace level 1' **should remain optional** for Member States rather than mandatory; accordingly, Article 15 of IR (EU) 2019/947 should use 'may' instead of 'shall'.
- b. 'U-space airspace level 1' designation **should be limited to airspace below the VFR minima and outside protected areas of aerodromes** to reduce encounter rates and prevent interoperability issues with manned aviation, particularly with aircraft equipped with existing collision avoidance systems. Obviously, this should not apply to aerodromes that have arrangements in place to accommodate UAS operations.
- c. 'U-space airspace level 1' when established in an area with a low number of manned and unmanned aircraft prevents scaling. With only the Flight Authorisation being removed which is solely acting as mitigation measure for UA-UA deconfliction, there is no reason for putting extra limitation of manned traffic density on Level 1 airspace. **Adding a low population density makes the business viability for a USSP impossible.** In these cases, the Member State needs to make these services available.

Airspace Risk Assessment (ARA)



- a. To keep the ‘U-space airspace level 1’ framework simple and effective, **the ARA should be standardised** to allow for EU-wide harmonisation and focus strictly on defining the residual ARC as defined in the SORA methodology and valuing the U-space services as adequate mitigating actions.
- b. **The assessment should become drastically simplified and more standardized**, embracing the structural uncertainty and recognizing data collection challenges. Assessments should focus on safety improvement without requiring a perfect traffic data picture.
- c. The ARA should preserve SORA’s flexibility for meeting the TMPRs; accordingly, BVLOS operators in ‘U-space airspace level 1’ **should be allowed to use onboard Detect and Avoid (DAA) systems**, without the need to use information or have procedures based from the ground-based traffic information service.
- d. The rigid concept of ‘conservative remain well clear (RWC) volumes’ for both manned<->unmanned and unmanned<->unmanned should be replaced with the **general performance principle** under IR (EU) 2019/947 of taking appropriate action to avoid collision with any other aircraft; accordingly, the regulation or associated AMC & GM should prescribe no specific manoeuvres or procedures.



The ‘U-space airspace level 1’ framework should remain accessible to all UAS operators, without imposing unnecessary operational or technical constraints. In particular:

- a. ‘U-space airspace level 1’ services should be **limited to**:
 - **traffic information service; and**
 - **network remote identification service.**
- b. The **option to use strategic (prior to take-off) deconfliction schemes** (flight authorisation) agreed between overlapping BVLOS operators within ‘U-space airspace level 1’ should be allowed and recognised.
- c. **VLOS operators should be allowed to continue operating under the standard conditions** applicable to their respective operational subcategory, without forcing them to a certain set of procedures or use any ‘U-space airspace level 1’ services; service use should remain voluntary for enhanced situational awareness, while VLOS operators continue to be responsible for controlling the unmanned aircraft in relation to other aircraft for the purpose of avoiding collisions under IR (EU) 2019/947.
- d. **Multiple BVLOS operators**, including those operating highly automated UAS, **should be permitted to operate simultaneously within ‘U-space airspace level 1’**; the framework should not artificially restrict such operations or require operators to transition prematurely to ‘U-space airspace level 2’ if the operational risks can be adequately managed under ‘U-space airspace level 1’, e.g. by the UAS operators sharing current and planned flight data.

USSP responsibility



It should be clarified that the responsibility of the USSP is to provide information consistently (Level 1) while **UAS operators are fully responsible to take the proper actions to separate from other traffic** (either manned or unmanned).