

03 October 2013

Graeme Harris  
Director Civil Aviation Authority  
PO Box 3555  
Wellington

Attention Mike Haines

### **Unattended Aerodromes Instrument Flight Procedures (IFP) Services Review**

We are being advised by Airways that the urgency with which a number of our operators who are also aerodrome providers are being required to respond to this matter is being driven by a deadline imposed by CAA pursuant to CAR Part 173 rule changes. The deadline is 14 October 2013.

We understand this rule part was introduced in the late 2000's and requires that procedures are reviewed and maintained regularly and to certain standards however our question is there any legislative requirement dictating the deadline seemingly imposed by CAA

Under normal circumstances we would have anticipated some formal transparent advice from the CAA of your requirements. However all we have received is a letter from Airways dated 15 September 2013 and while this letter outlines the background to the changes plus their deadlines etc but at the moment their deadlines appear to be driven by a requirement to respond to you in terms of some strict deadline.

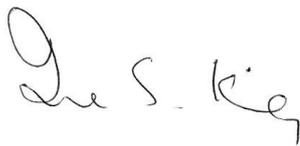
We would appreciate some clarification and discussion with the industry as to what is required and why. Presently the proposal is for some substantial costs associated with these changes and it is at a time when the particular sectors who use unattended aerodromes cannot afford the changes.

It is important for us to understand what your drivers are because at the moment the commercial imperative appears the sole driving force. If there is some safety imperative our plea is for an orderly and transparent process so that the Industry and its service providers can be on the same page.

We would appreciate an urgent response.

Thank you in anticipation

Yours sincerely

A handwritten signature in black ink that reads "Irene S. King". The signature is written in a cursive style with a large initial 'I'.

Irene King  
Chief Executive