



DIAS Position Paper

On the EASA Addendum to NPA 2026-103 regarding U-Space simplification

Support of progressive implementation

DIAS welcomes the authorities' responsiveness and their efforts to introduce these changes rapidly. We support the principle of simplification and the overall direction proposed. A step-by-step deployment offers a more pragmatic approach, allowing implementation to evolve with operational needs, technological maturity and market demand.

The proposed U-space level 1 rightly prioritises the network identification service and traffic information service. These are, in DIAS's view, the most relevant services for improving operators' awareness of surrounding traffic and supporting the safe scaling of beyond visual line of sight (BVLOS) operations, without imposing the full U-space service package from the outset. However, we do not support the definition and conditions of the level 1 U-Space as it is currently in the NPA.

Preserve Member State discretion

DIAS considers the proposed conditions governing the designation of U-space levels 1 and 2 overly restrictive and premature. The choice of level and its implementation conditions should rest with Member States, based on the specific operational environment, assessed risks and industry needs, rather than being predetermined through rigid EASA criteria.

Refine Level 1 definition and conditions

These additional principles are intended to ensure that the simplification of U-space Level 1 remains genuinely proportionate, operationally useful, and flexible enough to support different national and operational contexts. In particular, DIAS considers that the framework should avoid introducing new constraints that would undermine the very scalability and flexibility that Level 1 is meant to enable.

- In particular, proposed Article 3(2)(b) excludes level 1 from controlled airspace, effectively requiring level 2 wherever U-space is designated within such airspace. DIAS considers this blanket exclusion disproportionate and insufficiently substantiated. Controlled-airspace classification alone should not dictate the need for the full service package. Member States should be able to determine whether level 1, with appropriate mitigation measures, meets the safety and operational requirements of the specific environment.
- Its use should not be confined too narrowly to very low-density airspace or sparsely populated areas. Such limitations could prevent Level 1 from supporting meaningful scale and could weaken the business case for the required service provision.
- VLOS operations should continue under their existing operating rules. Where Level 1 services do not provide a clear additional safety benefit, their use should not become mandatory for VLOS operators.
- Level 1 should remain compatible with multiple simultaneous BVLOS operations, including highly automated operations, as long as the relevant risks can be managed appropriately. Operators should not be pushed prematurely into Level 2 simply because traffic volumes increase.
- Responsibilities should remain clearly separated: USSPs should be responsible for providing reliable and timely information, while UAS operators remain responsible for acting on that information and maintaining safe separation from other traffic.

DIAS recommendations

Remove the prescriptive designation criteria, including the exclusion of level 1 from controlled airspace. Leave Member States free to determine where and under which conditions U-space level 1 or level 2 is appropriate, without EASA prescribing that choice. National decisions should be supported by risk assessments and developed in consultation with the local industry stakeholders.