

**SMALL UAV
COALITION**
*A Partnership for
Safety & Innovation*

November 5, 2014

Honorable Michael Huerta
Administrator
Federal Aviation Administration
800 Independence Avenue SW
Washington, DC 20591

Dear Administrator Huerta,

The Small UAV Coalition¹ respectfully requests the FAA establish a new Small Unmanned Aerial Vehicle Aviation Rulemaking Committee (“sUAV ARC”) to address issues that may not be resolved in the pending sUAS rulemaking.

We expect the proposed sUAS rule, which has been under development for almost five years², will authorize operations of small UAVs only within the visual line of sight of the remote operator, and will require a remote operator to have continuous command and control throughout the flight. Therefore, the primary objective of the sUAV ARC would be to propose safety regulations and standards for autonomous and beyond visual line of sight operations.

The initial small UAS ARC completed its work in 2009. The FAA established another UAS ARC in 2011 (and recently extended its charter in June), but the current ARC has devoted most of its efforts on issues involving integrating large UAVs into navigable airspace. Regrettably, very little FAA work has been done looking at small UAVs flying autonomously beyond visual line of sight, which is where the technology is headed and commercial opportunities and consumer

¹ Members of the Small UAV Coalition include 3D Robotics, Aerialtronics, Airware, Amazon Prime Air, DJI Innovations, Google[x] Project Wing, GoPro, Parrot, PrecisionHawk, and SkyWard IO.

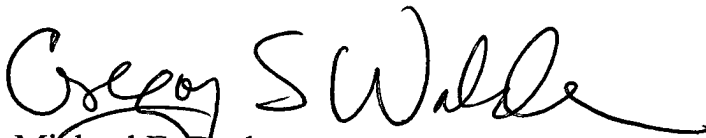
²<http://www.dot.gov/regulations/report-on-significant-rulemakings>

benefits abound. More attention and effort must be paid to small UAVs if the U.S. wants to remain at the forefront of this emerging technology.³

By their size, weight, altitude, and other characteristics, small UAVs present very different risk profiles compared with operations by scheduled and charter air carriers, business jets and general aviation, as both Congress and the FAA have recognized. The FAA and the small UAV sector would both benefit significantly from a committee focused on the operation of small UAVs with a membership that reflects a fair cross-section of this industry sector, comprised of manufacturers of small UAVs and UAV parts and payloads, operators and end users, technical experts, and associations and coalitions representing the interests of the small UAV sector.

Therefore, we respectfully ask that the FAA to expeditiously establish a sUAV ARC, identify and recruit members for the ARC, and task the ARC with completing its work no later than the end of fiscal year 2015.

Sincerely,



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³ Although the current ARC recently created a user working group looking at beyond visual line of sight operations (for all UAV sizes and altitudes), given the delay in promulgating rules for small UAV operations, the FAA needs a dedicated ARC to start the rulemaking process for autonomous and beyond the visual line of sight operations.