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SMALL UAV COALITION APPLAUDS FAA FOR PROGRESS ON SMALL UAS RULES; SUGGESTS OVER 20 REVISIONS

The Coalition believes the FAA can take additional steps to authorize commercial operations without adversely impacting safety

WASHINGTON, DC – April 22, 2014 – The Small UAV Coalition released its comments today in response to the Federal Aviation Administration's Notice of Proposed Rulemaking for Small Unmanned Aerial Systems (UAS). The Coalition supports the framework of the proposed rule and applauds the FAA for taking a data-driven, risk-based approach. The Coalition particularly supports the FAA's creation of a separate regulatory scheme for micro UAS operations; its replacement of pilot certification with operator certification based on passing of an aeronautical knowledge test; and for obviating airworthiness certification of small UAS within the operational limitations proposed.

However, the Coalition believes that many of the FAA's proposed rules are unduly restrictive and suggests over 20 revisions the FAA should adopt without derogation of safety. In particular, the Coalition suggests that the FAA:

- 1. Revise several limitations imposed on micro UAS operations related to altitude, automation, range, and proximity to airports;
- 2. Establish a process by which the FAA may authorize operations beyond the visual line of sight (BVLOS) under limited circumstances;
- 3. Revise several categorical restrictions such as those prohibiting night operations and operations over any person not directly involved in the operation and replace with a process by which the FAA may permit such operations in consideration of the technological capability of the UAS, the capability of the operator, the particular use and operating environment.
- 4. Establish an online testing procedure for initial and recurrent aeronautical knowledge testing;
- 5. Allow a small UAS be operated to transport property for compensation or hire, by means of a streamlined certification process based on an evaluation of any increase in risk in transporting property and mitigating such risk.

In addition, the Coalition suggests several steps the FAA can take outside the rulemaking. First, the FAA should establish an electronic UAS registration database to streamline the aircraft registration process. Second, the FAA should adopt a performance-based authorization process for operations and technology beyond what the FAA proposes in this rulemaking, such as sense-and-avoid technology and large-scale BVLOS operations. Finally, the Coalition supports NASA's efforts to design an unmanned aircraft traffic management system (UTM) to operate independently of the FAA but with FAA oversight.

The Small UAV Coalition urges the FAA to consider all comments filed regarding the sUAS NPRM as expeditiously as possible, so that a final rule may be published in the near term. We look forward to working with all stakeholders involved to create a pathway toward safe commercial operation of small UAS.

To read the Coalition's full comments visit <u>http://www.smalluavcoalition.org/comments-letters</u>. Contact <u>press@smalluavcoalition.org</u> for more information, or follow @smallUAVs on Twitter.