

**BEFORE THE  
DEPARTMENT OF TRANSPORTATION  
FEDERAL AVIATION ADMINISTRATION  
WASHINGTON, D.C.**

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**IN THE MATTER OF**

**Petition of Industrial Skyworks (USA), Inc. for Exemption**

**Docket Number: FAA-2014-1060**

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**COMMENTS OF THE SMALL UAV COALITION**

Michael E. Drobac  
Jennifer L. Richter  
Gregory S. Walden  
Akin Gump Strauss Hauer & Feld LLP  
1333 New Hampshire Ave, N.W.  
Washington, D.C. 20036  
(202) 887-4000  
*Counsel to the Small UAV Coalition*

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**Introduction**

The Small UAV Coalition<sup>1</sup> is pleased to provide its comments in support of the petition for exemption submitted by Pillsbury Winthrop Shaw Pittman LLP on behalf of Industrial Skyworks (USA), Inc. (Skyworks) under section 333 of the FAA Modernization and Reform Act of 2012 (“the Act”). Skyworks proposes to operate as many the Aeryon Labs. Inc. SkyRanger small unmanned aerial vehicle and system (“UAV” and “UAS”) for the purpose of conducting roofing and building inspection during day and night.<sup>2</sup> Members of the Small UAV Coalition share an interest in advancing regulatory and policy changes that will permit the operation of small UAVs in the near term, within and beyond the line of sight, with varying degrees of autonomy, for commercial, consumer, recreational and philanthropic purposes.

We applaud the Federal Aviation Administration (“FAA”) for recently accelerating the pace of exemptions, as well as reforming the terms and conditions for such exemption, although the Coalition believes there are many additional steps the FAA can take to improve the section 333 process and broaden the authority to conduct commercial operations. In particular, we believe

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<sup>1</sup> Members of the Small UAV Coalition include 3D Robotics, Aerialtronics, AirMap, Airware, AGI, Amazon Prime Air, Botlink, DJI Innovations, Drone Deploy, EHang, Flirtey, Google[x] Project Wing, GoPro, HAZON Solutions, Intel, InterMedia Development Corporation, Kespry, Parrot, PrecisionHawk, Sky-Futures, SkyWard IO, SkyPan, Strat-Aero, Verify, and Zero Tech.

<sup>2</sup> Skyworks sees also to operate the Aeryon Labs’ Scout UAS and for additional purposes. While the Coalition supports Skyworks’ petition in full, this comment addresses only Skyworks’ request to operate the SkyRanger at night.

the FAA has the authority and the discretion to permit small UAS operations at night, and should therefore grant this petition.

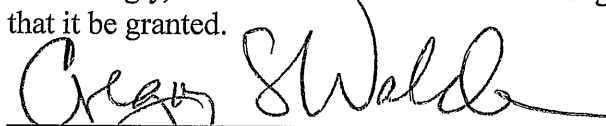
Skyworks will conduct its roof and building inspections within a perimeter of 100 feet around the building, operating below 400 feet AGL, and within the visual line of sight of the operator and visual observer. The SkyRanger weighs 6.5 pounds, including payload.

Skyworks' proposed operations at night should be authorized. A standard condition of a section 333 exemption is that the operations must occur between sunrise and sunset. This condition is also reflected in section 107.29 of the FAA's sUAS proposed rule. In comments the Coalition submitted in response to the sUAS proposed rule, we urge the FAA to authorize nighttime operations of UAS upon an equivalent level of safety demonstration, in consideration of technological capabilities of the sUAS – including lighting equipage – the capability of the UAS operator, the presence of one or more visual observers, the particular use scenario, and the operating environment, including the degree of illumination.

Here, Skyworks will equip the SkyRanger with red light emitting diode (LED) lights visible up to 5,000 feet. The building(s) and wall(s) to be inspected will be illuminated. Also, in response to the FAA's request for additional information, Skyworks explained that the takeoff and landing areas will be illuminated and positioned so as not to interfere with night adaptation. Skyworks' operators will be trained and experienced in nighttime operations; Skyworks reports that it has flown many hours in Canada during nighttime over a period of 16 months without accident or incident, giving it substantial experience in operations and risk-management.

Considering these protections, the particular operating environment and use scenario, and the training and experience of the operators, the Coalition believes that Skyworks' proposed nighttime operations should be permitted.

Accordingly, the Small UAV Coalition strongly supports Skyworks' petition and recommends that it be granted.



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