

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

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**IN THE MATTER OF**

**Petition of Astraerus Aerial for Amendment to Exemption No. 11062B**

**Docket Number: FAA-2014-0352**

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**COMMENTS OF 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 by Astraeus Aerial for an amendment to Exemption No. 11062B to permit Astraeus Aerial to operate its small unmanned aircraft systems authorized under its current exemption, as amended, using augmented visual line of sight operations with a two-person pilot system in which one pilot maintains visual line of sight and the other pilot manipulates the aircraft using first person viewing (“FPV”).

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 accelerating the pace of exemptions. The Coalition believes there are additional steps the FAA can take to broaden the authority to conduct commercial operations. In particular, the FAA has the authority and the discretion to grant the relief requested by Astraeus Aerial in its petition for amendment.

The issue whether to allow a two-pilot system in which the manipulator of the controls uses FPV and another pilot – the visual observer – maintains continuous visual line of sight was raised by the FAA in the preamble to its sUAS proposed rule. 80 Fed. Reg. 9544 (Feb. 23, 2015). The FAA invited comments on ways in which an FPV device “could be used by the operator without

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<sup>1</sup> Members of the Small UAV Coalition include 3D Robotics, AirMap, AGI, Amazon Prime Air, Botlink, DJI Innovations, Drone Deploy, Flirtey, Google[x] Project Wing, GoPro, Intel, Kespary, Parrot, PrecisionHawk, Strat-Aero, Verizon Ventures, and Zero Tech.

compromising the risk mitigation proposed visual line-of-sight requirement[.]” 80 Fed. Reg. at 9560. In its comments on the sUAS proposed rule, the Coalition noted FAA’s statement:

If the operation is augmented by at least one visual observer, the operator is not required to exercise this capability, as long as the visual observer maintains a constant visual line-of-sight of the small unmanned aircraft.

80 Fed. Reg. at 9559. The Coalition expressed concern that not allowing the visual observer to share in the operational control of the sUAS would defeat the purpose of a visual observer.

The Coalition believes that the two-pilot system proposed by Astraesus Aerial will ensure that its sUAS operations will be as safe as where a single pilot manipulates the controls and maintains visual line of sight, which is the current standard condition the FAA includes in its section 333 exemptions. The only difference is that the manipulator of the controls will use first person viewing and will rely on another pilot to maintain the visual line of sight. Assuming there will be a reliable and constant communication link between the visual observer pilot and the controls manipulator pilot, the operations proposed by Astraesus Aerial can be conducted safely without additional risk to other aircraft or to persons and property on the ground.

Respectfully submitted,



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