

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

IN THE MATTER OF

**Petition of Charles Franklin, Inc. d/b/a Wild Horses A Film Company for Amendment to
Exemption No. 11831**

Docket Number: FAA-2015-1022

COMMENTS OF THE SMALL UAV COALITION

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Introduction

The Small UAV Coalition¹ is pleased to provide its comments in support of the petition by Charles Franklin, Inc. d/b/a Wild Horses A Film Company (“Wild Horses”) for an amendment to Exemption No. 11831 to permit Wild Horses to operate its small unmanned aircraft (DJI Inspire 1) for closed-set filming using an operator with a trained and experienced pilot who does not hold an airman certificate.

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 Wild Horses in its petition for amendment and replace standard Condition No. 13 with a condition requiring its pilots to be trained and experienced in operating the particular sUAS in the closed-set filming environment.

¹ 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, Kespry, Parrot, PrecisionHawk, Strat-Aero, Verizon Ventures, and Zero Tech.

Closed-set filming

By their nature, closed-set filming operations do not pose risks to persons not involved with the filming who are not on the set. While filming may be conducted over private property, inherent in closed-set filming is the knowledge and consent of the private property owners, as well as all those who are on the set, whether or not they are involved in the UAV operation. Moreover, operating a small UAV in place of a helicopter provides a significant increase in safety for all persons on the set.

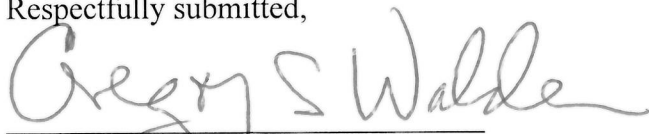
Airman certification

The Coalition supports Wild Horses' request to use a non-FAA certificated pilot to operate the UAVs during closed-set filming. The Coalition, in its comments to the FAA's sUAS proposed rule, urged the FAA to adopt small UAS operator qualifications that matched the skills necessary to operate the particular UAV as well as the basic knowledge gained in FAA ground school training. The FAA is proposing to require a small UAS operator to pass only an aeronautical knowledge test, and not require the holding of a commercial, private, recreational, or sport pilot certificate. 80 Fed. Reg. at 9588 (proposed Part 107, Subpart C). In a closed-set filming environment, there may be less of a need to understand certain airspace rules.

Wild Horses states that its pilot in command has decades of experience operating UAVs and thus we assume that this pilot is highly skilled in operating the small UAVs that Wild Horses will operate in closed-set filming. The Coalition agrees with Wild Horses that the FAA can grant the requested relief. As the Coalition has stated in its comments on the sUAS proposed rule and in comments in section 333 proceedings, the FAA has the statutory exemption authority and discretion to exempt a UAS operator from the airman certification requirements in Part 61.

Given the experience of Wild Horses' pilot and the nature of closed-set filming, the Coalition supports the requested relief.

Respectfully submitted,



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