

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

IN THE MATTER OF

Petition of The Visual Arts Group, LLC for Amendment to Exemption No. 11733

Docket Number: FAA-2015-0036

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 The Visual Arts Group, LLC (“Visual Arts”) for an amendment to Exemption No. 11733 to permit Visual Arts to launch its small unmanned aircraft (DJI S1000 and DJI Inspire 1) from a moving vessel, such as golf carts, camera dollies and other slow moving vehicles customarily used on motion picture and television sets for the purpose of transporting movie cameras during the filming process.

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 Visual Arts in its petition for amendment.

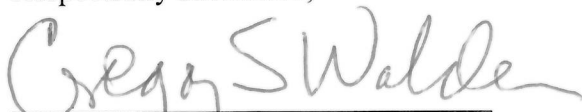
By their nature, closed-set filming operations do not pose risks to persons not involved with the filming who are not on the set. While filming may be conducted over private property, inherent in closed-set filming is the knowledge and consent of the private property owners, as well as all those who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

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.

Operations from a moving platform are common situations for closed-set filming. In comments the Coalition filed in response to the FAA's small UAS ("sUAS") proposed rule, 80 Fed. Reg. 9544 (Feb. 23, 2015), we urged the FAA to allow operations from moving vehicles with appropriate safeguards. Operating a small UAV in place of a helicopter provides a significant increase in safety for all persons on the set. As Visual Arts explains, the moving vehicles will be operated at speeds at or below 25 mph and within clearly marked safety boundaries. An additional crew member other than the sUAS pilot will operate the moving vehicle. With adequate notice to persons on the set, operating a UAV from a moving platform should not pose any additional safety risk.

Given Visual Arts' safety measures and the nature of closed-set filming, the Coalition supports the requested relief.

Respectfully submitted,



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