

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

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**IN THE MATTER OF**

**Petition of Helicopters West Aerospace LLC for Amendment to Exemption No. 11559**

**Docket Number: FAA-2015-0430**

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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 Helicopters West Aerospace LLC (“Helicopters West”) for an amendment to Exemption No. 11559 to permit Helicopters West to launch its small unmanned aircraft from a moving platform for the purpose of closed-set filming.

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 Helicopters West 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.

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

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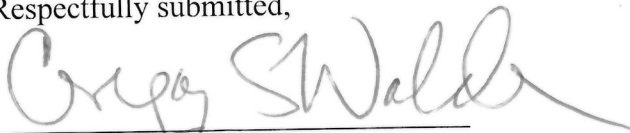
<sup>1</sup> Members of the Small UAV Coalition include 3D Robotics, AirMap, AGI, Amazon Prime Air, Botlink, DJI Innovations, Drone Deploy, Flirtey, Google[x] Project Wing, GoPro, Intel, Kespry, Parrot, PrecisionHawk, Strat-Aero, T-Mobile, Verizon Ventures, and Zero Tech.

appropriate safeguards. Operating a small UAV in place of a helicopter provides a significant increase in safety for all persons on the set. With adequate notice to persons on the set, operating a UAV from a moving platform should not pose any additional safety risk.

Helicopters West has submitted an Operations Manual specifically addressing operations from a moving platform. While this document was provided confidentially and is not available in the public docket, we note that Helicopters West has performed a Safety Risk Management study and we trust that the Manual and Risk Management study more than adequately address any safety risks poses by operations from a moving platform.

Given Helicopter West's safety measures and the inherent low risk of closed-set filming, the Coalition supports the requested relief.

Respectfully submitted,



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