

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

IN THE MATTER OF

Petition of Liberty Mutual Insurance Company for Amendment to Exemption No. 11857

Docket Number: FAA-2015-0513

COMMENTS OF THE SMALL UAV COALITION

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

March 16, 2016

Filed with www.regulations.gov

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

IN THE MATTER OF

Petition of Liberty Mutual Insurance Company for Amendment to Exemption No. 11857

Docket Number: FAA-2015-0513

COMMENTS OF THE SMALL UAV COALITION

The Small UAV Coalition¹ is pleased to provide its comments in support of the petition submitted by Cooley LLP of behalf of Liberty Mutual Insurance Company (“Liberty Mutual”) for an amendment to Exemption No. 11857 to permit Liberty Mutual to operate its Liberty 4 small unmanned aircraft system (“sUAS”) to conduct home and business roof inspection and large structure/fire inspection in metropolitan areas within a 25-foot perimeter of the building, obtaining the consent only of those property owners within the area of operations.

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 permit small UAS operations within 25 feet of building under the circumstances proposed in this petition for amendment, and should therefore grant this petition for a revision to standard condition 26.

The FAA recently granted exemption authority to conduct operations closer than 500 feet from persons not involved in the UAS operation. See Exemption No. 13465 (undated) to Kansas State University, Docket No. FAA-2014-1088.

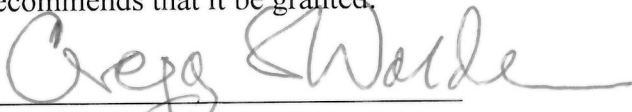
The facts supporting Liberty Mutual’s petition are strong: its sUAS operations, light weight and operating at an air speed no greater than 5 mph, and will be confined to a 25-foot perimeter

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, T-Mobile, Verizon Ventures, and Zero Tech.

around the building to be inspected. Liberty Mutual will create a safety zone within the 25-foot perimeter, ensure no unauthorized person enters the safety zone, and will obtain the consent of property owners within the safety zone. Liberty Mutual will also conduct an onsite safety assessment per a Flight Operations Manual provided to the FAA confidentially. Under these circumstances, especially in a metropolitan area, the Coalition agrees that requiring notice to and consent of all property owners within a 500- foot radius is impractical and unnecessary.

The three conditions the FAA lists in Exemption No. 13465 for operations closer than 500 feet from persons who are not involved in the sUAS operation are: (1) the operator must brief the persons and obtain their consent; (2) the operator must have an operations manual that addresses the safety risks posed by such operations; and (3) the operator must file a plan of activities with the local Flight Standards District Office at least 24 hours before initiating operations. We assume Liberty Mutual's Flight Manual meets these conditions and is more than adequate to ensure the safety of Liberty Mutual's proposed operations.

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



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

March 16, 2016