

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

IN THE MATTER OF

Petition of Sky-Futures USA, Inc. for Amendment to Exemption

Docket Number: FAA-2014-0641

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

February 29, 2016

Filed with www.regulations.gov

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

IN THE MATTER OF

Petition of Sky-Futures USA, Inc. for Amendment to Exemption No. 11208

Docket Number: FAA-2014-0641

COMMENTS OF THE SMALL UAV COALITION

Introduction

The Small UAV Coalition¹ is pleased to provide its comments in support of the petition for amendment to Exemption No. 11208 submitted by Sky-Futures USA, Inc. (“Sky-Futures”) under section 333 of the FAA Modernization and Reform Act of 2012 (“the Act”). Sky-Futures proposes to operate the AscTec Falcon 8, DJI S1000+, and DJI Matrice 100 small unmanned aircraft systems (“small UAS”) from a barge in the Gulf of Mexico for the purpose of aerial data collection over open water.

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 from moving boats and barges, and should therefore grant this petition for amendment.

Sky-Futures’ proposed operations over water from a barge should be authorized. The FAA’s sUAS proposed rule (proposed section 107.25) would allow such operations. The FAA explained:

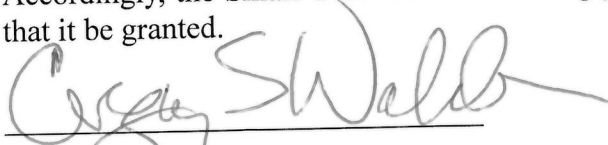
¹ Members of the Small UAV Coalition include 3D Robotics, AirMap, AGI, Amazon Prime Air, Botlink, DJI Innovations, Drone Deploy, Flirtey, Google[x] Project Wing, GoPro, Intel, Kespry, Parrot, PrecisionHawk, Strat-Aero, Verizon Ventures, and Zero Tech.

This is because there are far less people and property located over water than on land. Consequently, a loss of positive control that occurs over water would have a significantly smaller chance of injuring a person or damaging property than a loss of positive control over land. Allowing use of a small UAS from a water-borne vehicle would also increase the societal benefits of this proposed rule without sacrificing safety by incorporating small UAS operations such as bridge inspections and wildlife nesting area evaluations into the NAS.

80 Fed. Reg. at 9562.

In comments the Coalition submitted in response to the sUAS proposed rule, we supported the FAA's proposal, partly in recognition that some sUAS operations may be conducted effectively only from the water. We believe that Sky-Futures' purpose in aerial data collection makes sense only if the data can be collected from a UAV operating over water, and thus operating from a barge in the Gulf of Mexico. We believe operations over water from a moving boat or barge can be operated safely, in consideration of technological capabilities of the sUAS, the capability of the UAS operator, the particular use scenario, and the operating environment. Sky-Futures also employs a number of safety features for shipborne operations as outlined in its UAS Operations Manual, and has adopted a Safety Management System ("SMS") to identify and minimize risk.

Accordingly, the Small UAV Coalition strongly supports Sky-Futures' 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

February 29, 2016