

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

IN THE MATTER OF

Petition of AGERpoint Inc. for Amendment to Exemption No. 12586

Docket Number: FAA-2015-0323

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 30, 2016

Filed with www.regulations.gov

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Introduction

The Small UAV Coalition¹ is pleased to provide its comments in support of the petition by AGERpoint Inc. (“AGERpoint”) for an exemption to operate the Guided Systems Technologies, Inc. SiCX-75 unmanned aircraft system (“UAS”) that weighs 170 pounds including payload, for aerial mapping primarily for precision agriculture.

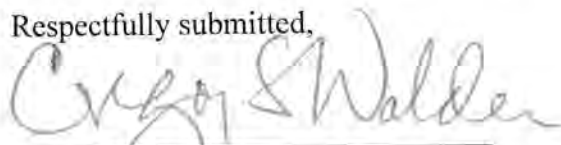
Members of the Small UAV Coalition share an interest in advancing regulatory and policy changes that will permit the operation of small UAVs in the near term, within and beyond the line of sight, with varying degrees of autonomy, for commercial, consumer, recreational and philanthropic purposes. The 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 AGERpoint its petition for amendment.

Last year the FAA granted Exemption No. 11488 to Yamaha Motor Corporation, U.S.A. to operate a UAS weighing over 200 pounds, -- 141 lbs. empty weight and 61 lbs. of payload, also to conduct agricultural operations, subject to the standard conditions and limitations and special conditions related to the weight of the UAS (e.g., limiting the speed of the UAV to 45 mph). The Coalition supports AGERpoint’s petition to conduct aerial mapping primarily for precision agriculture, in consideration of the FAA’s standard conditions and limitations, which mitigate safety risks to persons and property, and on the assumption that FAA may impose one or more additional conditions, as it did in Exemption No. 11488, if necessary to mitigate any increase in risk due to the weight of the UAS.

¹ Members of the Small UAV Coalition include AirMap, AGI, Amazon Prime Air, Botlink, DJI Innovations, Flirtey, Google[x] Project Wing, Intel, Kesyry, Parrot, PrecisionHawk, Strat-Aero, T-Mobile, Verizon Ventures, and Zero Tech.

Accordingly, the Coalition supports AGERpoint's petition for exemption.

Respectfully submitted,

A handwritten signature in cursive script that reads "Gregory S. Walden". The signature is written in black ink and is positioned above a horizontal line.

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