

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

IN THE MATTER OF

Petition of Walt Disney Parks and Resorts U.S., Inc. for Exemption

Docket Number: FAA-2015-8680

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 filed by Arnold & Porter on behalf of Walt Disney Parks and Resorts U.S., Inc. (“Disney”) for an exemption operate up to 50 Disney Flixels small unmanned aircraft systems (“sUAS”) as part of live entertainment shows at Disneyland and Walt Disney World.

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 Disney in its petition for exemption.

We believe the issue before the FAA is whether to authorize a single airman to operate (including the management of automated operation of) multiple UAS at the same time, and to authorize multiple UAS to be operated in a flying formation. In its sUAS proposed rule, the FAA proposes to limit the operation of sUAS to a single person in proposed section 107.35. In comments to the sUAS proposed rule, the Coalition suggests the FAA should authorize a sUAS operator to operate more than one UAV at a time through a showing of the operator’s capability, in tandem with the technological capabilities of the sUAS.

Disney notes that its operations will not interfere with the navigable airspace because both Disney resorts are no-fly zones. As for its operations as close at 100 feet from viewing guests,

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

Disney will provide two geofences, its Flixels weighs under 10 pounds and will operate slower than 6 knots during each five-minute segment. Take off and landings will occur over water or otherwise in restricted areas and the Flixels will operate in preprogrammed routes in a restricted zone off limits to guests. Disney states that its nighttime operations will be in compliance with FAA guidance.

The Coalition notes that it supported the petition of Ars Electronica Linz GmbH and Intel Corporation to conduct light shows with a single flight controller operating as many as 30-35 UAVs, with a total of up to 100 UAVs, and the FAA granted this petition in Exemption No. 14088. We believe the FAA should grant Disney's request within the parameters of the exemption it granted to Ars Electronica and Intel, scaled to fit the scope of Disney's entertainment show, and to grant Disney's request to conduct its UAS show after civil twilight.

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

Respectfully submitted,



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