

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

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**IN THE MATTER OF**

**Petition of Iowa State University of Science and Technology**

**Docket Number: FAA-2015-4716**

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**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*

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**Introduction**

The Small UAV Coalition<sup>1</sup> is pleased to provide its comments in support of the petition by Dentons on behalf of Iowa State University of Science and Technology Amazon.com (“ISU”) for an exemption operate “multiple” small unmanned aircraft systems (“sUAS) in “closely coupled collaborative flight” as part of an educational subprogram.

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 ISU 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.

ISU’s operations will be conducted within the visual line of sight, during daylight, more than five miles from an airport and over property owned and controlled by ISU. The Coalition notes that

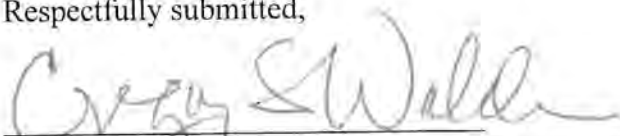
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<sup>1</sup> Members of the Small UAV Coalition include AirMap, AGI, Amazon Prime Air, Botlink, DJI Innovations, Flirtey, Google[x] Project Wing, Intel, Kesyry, Parrot, PrecisionHawk, Strat-Aero, T-Mobile, Verizon Ventures, and Zero Tech.

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, and the FAA granted this petition in Exemption No. 14088. We believe the FAA should grant ISU's request within the parameters of the exemption it granted to Ars Electronica and Intel, scaled to fit the scope of ISU's "closely coupled collaborative" flights.

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

Respectfully submitted,



Gregory S. Walden  
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Washington, D.C. 20036  
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