

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

IN THE MATTER OF

Petition of Martin UAV for Exemption

Docket Number: FAA-2015-5644

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 by Martin UAV (“Martin”) for an exemption to operate two unmanned aircraft systems (“UAS”) that weigh up to 136 pounds including payload.

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 Martin its petition.

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, 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 Martin’s petition to operate two UAS models heavier than 55 pounds, 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.²

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.

² The Coalition previously filed comments in FAA Docket 2015-0323 in support of AGERpoint, Inc.’s petition to operate a UAS weighing over 55 pounds.

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

Respectfully submitted,



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