



**SMALL UAV
COALITION**
*A Partnership for
Safety & Innovation*

May 18, 2016

Honorable Michael Huerta
Administrator
Federal Aviation Administration
800 Independence Avenue SW
Washington, DC 20591

Re: A Proposal to Improve the Section 333 Exemption Amendment Process

Dear Administrator Huerta:

The Small UAV Coalition appreciates the steps the FAA has made to reform and improve the section 333 process, including the decision in March of this year to grant exemptions under which the exemption holder is authorized to operate any of the unmanned aircraft system (UAS) models on an Approved List the FAA has posted on its website. This decision has obviated hundreds, if not thousands, of requests to amend exemptions to include additional UAS models other than the models included in the operator's initial petition, and is a very welcome reform.

However, there remain many pending petitions to amend a section 333 exemption to include additional UAS models, perhaps hundreds of such petitions. Some petitioners have been waiting since last fall for a response. Delays in processing section 333 petitions to date have resulted in numerous lost economic investment opportunities and hindered further innovation and development in this industry.

We recognize the enormous time and effort necessary to process these routine amendment requests to grant the authority to operate any UAS on the Approved List and the finite resources in the UAS Integration Office. We respectfully suggest that the FAA need not expend its resources processing these amendment requests and at the same eliminate any further delays to petitioners, by granting immediate effective authority to existing exemption holders to operate any UAS model on the Approved List. The FAA has the authority and discretion to determine that it will not take any enforcement action against any person holding a section 333 exemption for operating a UAS model not identified in the exemption, provided the UAS model operated is on the Approved List. This decision would have no impact on safety, given that the FAA determined in March to authorize exemption holders to operate any UAS model on the Approved List. We also suggest that FAA announce this determination publicly, to obviate individual notification to exemption holders.

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Thank you for considering this recommendation to immediately grant effective authority to section 333 exemption holders to operate any UAS model on the Approved List.

Sincerely,



Gregory S. Walden
Aviation Counsel
Small UAV Coalition