

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

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**IN THE MATTER OF**

**Petition of Drone Surveys and Reports for Amendment to Exemption No. 11800**

**Docket Number: FAA-2015-1020**

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**COMMENTS OF 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 Drone Surveys and Reports (“Drone Surveys”) for an amendment to Exemption No. 11800 to permit Drone Surveys to operate its small unmanned aircraft systems (“sUAS”) using a pilot who does not hold an airman certificate, who is under the supervision of an air transport or commercial pilot, and who has completed a minimum number of flight hours operating UAS models, including a minimum number of takeoffs and landings.

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 Drone Surveys in its petition for amendment.

The Coalition supports Drone Surveys’ request to use non-FAA certificated pilots to operate sUAS under the circumstances set forth in the petition. Drone Surveys will ensure that each pilot is under the supervision of an ATP or commercial certificate holder. More important, the pilot in command (“PIC”) will be required to have logged: (1) at least 100 flights and 25 hours as a sUAS rotorcraft pilot and (2) at least 10 hours with a similar sUAS type; (3) 5 hours with the same make and model of the sUAS; and (4) 3 takeoffs and landings in the preceding 90 days. Other pilots will be required to have logged: (1) at least 150 flights and 50 hours as a sUAS

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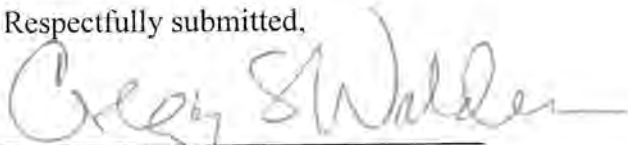
<sup>1</sup> Members of the Small UAV Coalition include AGI, AirMap, Amazon Prime Air, Botlink, Flirtey, Google[x] Project Wing, Intel, Kespry, PrecisionHawk, Strat-Aero, T-Mobile, Verizon Ventures, Walmart, and Zero Tech.

rotorcraft pilot and (2) at least 15 hours with a similar sUAS type; (3) 10 hours with the same make and model of the sUAS; and (4) 5 takeoffs and landings in the preceding 90 days.

The Coalition, in its comments to the FAA's sUAS proposed rule, urged the FAA to adopt small UAS operator qualifications that matched the skills necessary to operate the particular UAV as well as the basic knowledge gained in FAA ground school training. The FAA is proposing to require a small UAS operator to pass only an aeronautical knowledge test, and to not require the holding of a commercial, private, recreational, or sport pilot certificate. 80 Fed. Reg. at 9588 (proposed Part 107, Subpart C). As the Coalition has stated in its comments on the sUAS proposed rule and in comments in section 333 proceedings, the FAA has the statutory exemption authority and discretion to exempt a UAS operator from the airman certification requirements in Part 61, and replace that requirement with an aeronautical knowledge test and flight training experience appropriate to the proposed sUAS operations. Drone Surveys will require of its pilots ample flight training with sUAS including with the particular sUAS models to be operated under this exemption. These requirements will ensure that operations will provide much more than an equivalent level of safety that would be provided by a certificated airman without any sUAS flying experience.

Accordingly, the Coalition supports Drone Surveys' petition to operate its sUAS models using pilots who do not hold an airman certificate, under the conditions and limitations outlined its petition for amendment.

Respectfully submitted,



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