

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

IN THE MATTER OF

Petition of Jackie E. Watson for Amendment to Exemption No. 12077

Docket Number: FAA-2015-1418

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 Jackie E. Watson (“Watson”) for an amendment to Exemption No. 12077 to permit Watson to operate small unmanned aircraft systems (“sUAS”) using a pilot who holds an airman certificate but without being subject to the flight training requirements in 14 C.F.R. 61.56(a), which requires at least one hour of ground training and one hour of manned aircraft flight training.

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 Watson.

The Coalition supports Watson’s request require one hour of ground training but not to require one hour of manned aircraft flight training. 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

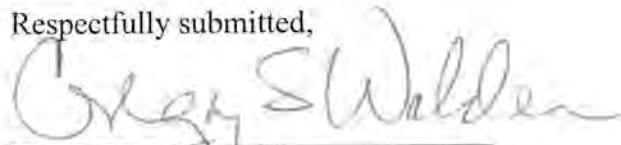
¹ Members of the Small UAV Coalition include AGI, AirMap, Amazon Prime Air, Botlink, Flirtey, Google[x] Project Wing, Intel, Kespry, PrecisionHawk, Strat-Aero, T-Mobile, Verizon Ventures, Walmart, and Zero Tech.

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.

Watson does not seek relief from the airman certification requirement, but only from the manned aircraft flight training requirement in FAR 61.56, which is keyed to an aircraft in which the pilot is rated. We see no benefit or purpose in requiring a sUAS pilot to undergo one hour of flying a *manned* aircraft as part of any flight review protocol. Watson will require one hour of ground training and geared to the knowledge relevant to sUAS operations, and this training should suffice.

Accordingly, the Coalition supports Watson's petition to operate sUAS models using pilots without those pilots being required to meet the flight training requirements in FAR 61.56.

Respectfully submitted,



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