

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

IN THE MATTER OF

Petition of Astraeus Aerial for Amendment to Exemption No. 11062

Docket Number: FAA-2014-0352

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 Astraeus Aerial for an amendment to Exemption No. 11062 to operate the Astraeus Aerial V.4CS, an unmanned aircraft system (“UAS”) weighing over 55 pounds, for the purpose of aerial videography.

Members of the Small UAV Coalition share an interest in advancing regulatory and policy changes that will permit the operation of UAS in the near term, within and beyond the line of sight, with varying degrees of autonomy, for commercial, civil, 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 Astraeus Aerial in its petition.

The FAA granted Astraeus Aerial a Part 107 waiver on November 25, 2016 to conduct UAS operations at night, as well as UAS operations using first person view (FPV) from a Ground Control Station (GCS) in lieu of visual line of sight. This authorization affirms that the company is committed to upholding safety and has taken necessary steps to address potential risks related to these expanded operations.

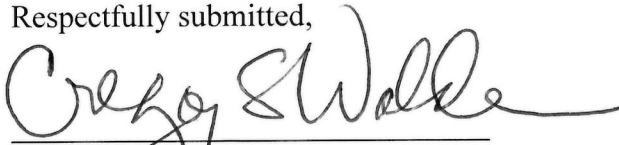
Furthermore, last year the FAA granted Exemption No. 11488 to Yamaha Motor Corporation, U.S.A. to operate a UAS weighing over 200 pounds, -- 141 lbs. empty weight and 61 lbs. of payload, to conduct agricultural operations, subject to the standard conditions and limitations and special conditions related to the weight of the UAS (e.g., limiting the speed of the UAV to 45

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

mph). The Coalition supports Astraeus Aerial's petition to operate the Astraeus Aerial V.4CS , 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

Accordingly, the Coalition supports Astraeus Aerial's petition for exemption.

Respectfully submitted,



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² The Coalition previously filed comments in both FAA Docket 2015-0323 in support of AGERpoint, Inc.'s petition and FAA Docket 2015-5644 in support of Martin UAV's petition. Both companies sought to operate a UAS weighing over 55 pounds.