

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

---

**IN THE MATTER OF**

**Petition of Brewster Fresh Produce for Amendment to Exemption No. 12363**

**Docket Number: FAA-2016-4931**

---

**COMMENTS OF THE SMALL UAV COALITION**

Gregory S. Walden  
Akin Gump Strauss Hauer & Feld LLP  
1333 New Hampshire Ave, N.W.  
Washington, D.C. 20036  
(202) 887-4000  
*Counsel to the Small UAV Coalition*

January 18, 2017

Filed with [www.regulations.gov](http://www.regulations.gov)

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

---

**IN THE MATTER OF**

**Petition of Brewster Fresh Produce for Amendment to Exemption No. 12363**

**Docket Number: FAA-2016-4931**

---

**COMMENTS OF THE SMALL UAV COALITION**

**Introduction**

The Small UAV Coalition<sup>1</sup> is pleased to provide its comments in support of the petition by Brewster Fresh Produce for an amendment to Exemption No. 12363 to operate an unmanned aircraft system (UAS) with a maximum payload weight over 55 pounds for commercial agricultural purposes, including spraying services.<sup>2</sup>

UAS offer a safe and efficient means of conducting precision agriculture operations that can mitigate loss of valuable yield. For example, UAS can help detect and respond to problems caused by insects, drainage, disease, and other threats to crops and livestock. 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 Brewster Fresh Produce in its petition.

In 2015 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 Brewster Fresh Produce's petition to conduct agricultural operations similar to those

---

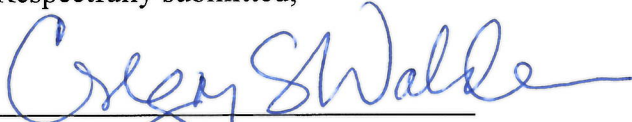
<sup>1</sup> Members of the Small UAV Coalition include AirMap, AGI, Amazon Prime Air, Flirtey, Fresh Air Educators, Google[x] Project Wing, Intel, Kespry, PrecisionHawk, T-Mobile, Verizon Ventures, and Walmart.

<sup>2</sup> The petition dated May 11, 2016 does not include the weight of the UAS it intends to operate.

authorized in Exemption No. 11488, in consideration of the conditions and limitations the FAA imposed in that exemption, which mitigate safety risks to persons and property.

Accordingly, the Coalition supports Brewster Fresh Produce's petition for amendment.

Respectfully submitted,



---

Gregory S. Walden  
Akin Gump Strauss Hauer & Feld LLP  
1333 New Hampshire Ave, N.W.  
Washington, D.C. 20036  
(202) 887-4000  
*Counsel to the Small UAV Coalition*

January 18, 2017