

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

IN THE MATTER OF

Petition of Leading Edge Associates, Inc. for Amendment to Exemption No. 11530C

Docket Number: FAA-2016-9423

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 Leading Edge Associates, Inc. (“Leading Edge”) for an amendment to Exemption No. 11530C to conduct aerial agricultural-related operations including spraying using the Yamaha RMAX, PrecisionVision 30, and PrecisionVision 10 unmanned aircraft systems (“UAS”).

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 Leading Edge in its petition.

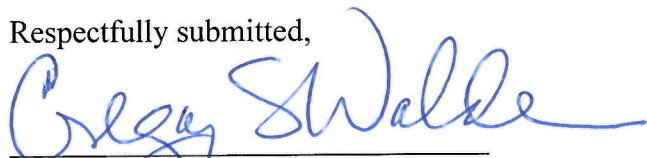
Leading Edge states it will use its UAS for “mosquito adulticiding and larvaciding in the vector markets using EPA approved, Federally labeled and registered products.” Leading Edge seeks an exemption from several provisions of Part 137 that are in all material respects similar to provisions in Part 91 for which FAA has granted over 5,000 exemptions. The Coalition supports Leading Edge’s petition to operate its UAS models, in consideration of the FAA’s standard conditions and limitations, which mitigate safety risks to persons and property, and on the

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.

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.

Accordingly, the Coalition supports Leading Edge's petition for amendment.

Respectfully submitted,



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