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

IN THE MATTER OF

Petition of Skylift Global, Inc. for Amendment to Exemption No. 16683

Docket Number: FAA-2015-7197

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 Skylift Global, Inc. ("Skylift Global") requesting an amendment to Exemption No. 16683 in order to operate an unmanned aircraft system (UAS) capable of carrying payloads over 200 pounds.

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 Skylift Global in its petition.

Furthermore, 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 Skylift Global's petition to conduct operations of a UAS of similar weight to the Yamaha RMAX UAS, in consideration of the FAA's conditions and limitations imposed in Exemption No. 11488 and in previous exemptions, which mitigate safety risks to persons and property.

Accordingly, the Coalition supports Skylift Global's petition for amendment.

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.

Respectfully submitted,

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