



**SMALL UAV**  
COALITION  
*A Partnership for  
Safety & Innovation*

February 28, 2017

Honorable Raja Krishnamoorthi  
U.S. House of Representatives  
515 Cannon House Office Building  
Washington, DC 20515

Re: Amendment to H.R. 998, SCRUB Act

Dear Congressman Krishnamoorthi:

The Small UAV Coalition<sup>1</sup> writes in support of your amendment to H.R. 998, the Searching for and Cutting Regulations that are Unnecessarily Burdensome Act (SCRUB Act), to ensure that the underlying legislation “will not in any way hinder the safe and legal development and deployment of unmanned aerial systems” (UAS) by exempting rules relating to the safety of the national airspace system.

The United States’ ability to fully realize the vast economic and consumer potential of commercial UAS technology is dependent upon future regulatory actions that will permit advanced operations currently prohibited or allowed only through burdensome waiver or exemption processes. The status quo currently imposes significant opportunity costs as U.S. businesses and individuals are prohibited from receiving the benefits of commercial UAS operations over people and beyond visual line of sight.

As the Coalition [wrote](#) to Office of Management and Budget Director Mulvaney on February 17, 2017, commercial UAS technology, like many rapidly developing sectors of the 21<sup>st</sup> century economy, is evolving at a pace that has exceeded nascent regulations. Industry needs a forward-leaning, progressive regulatory framework to realize the manifold safety, economic, and social benefits of commercial UAS operations. Three pending Federal Aviation Administration (FAA) rulemaking actions promise to deliver hundreds of millions of benefits to American industry and the public, at minimal cost to business, by authorizing commercial UAS operations over people and beyond the visual line of sight, with varying degrees of autonomy. Specifically, the rulemaking actions are:

- (1) Notice of Proposed Rulemaking, Operation of Small Unmanned Aircraft Over People<sup>2</sup>
- (2) Final Rule, Operation of Small Unmanned Aircraft Over People
- (3) Notice of Proposed Rulemaking, Expanded Operations

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<sup>1</sup> The Small UAV Coalition includes the following members: AirMap, Amazon Prime Air, Google[x], Intel, Kespry, PrecisionHawk, Verizon Ventures, Aerwaze, AGI, Flirtey, Fresh Air Educators, T-Mobile, and Walmart.

<sup>2</sup> The Operation of Small Unmanned Aircraft Over People NPRM, RIN 2120-AK85, is currently in interagency coordination and is subject to the review and approval of Secretary Chao under Presidential Memorandum “Regulatory Freeze Pending Review” (January 20, 2017).

Without additional FAA rulemaking, operations over people and beyond the visual line of sight will remain prohibited,<sup>3</sup> thereby stifling thousands of business opportunities and consumer benefits, as well as life-saving operations. Without these rulemaking actions, the UAS industry in the United States will stall while other countries assume the mantle of leadership and surpass America by creating forward-looking, risk-based regulatory frameworks for widespread UAS operations.

Thank you for supporting American innovation and leadership in this rapidly evolving sector of the 21<sup>st</sup> century economy.

Sincerely,



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<sup>3</sup> 14 C.F.R. Part 107, promulgated in 2016, includes waiver authority to permit operations over people and beyond the visual line of sight (“BVLOS”). To date, only one waiver has been granted to operate over people, and only four waivers to operate BVLOS.