

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

IN THE MATTER OF

Petition of Victor Lee & Associates for Exemption

Docket No. FAA-2018-0183

COMMENTS OF THE SMALL UAV COALITION

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The Small UAV Coalition¹ is pleased to provide its comments in support of the petition by Victor Lee & Associates (“Lee”) for an exemption to operate the Shotover U-1 unmanned aircraft system (“UAS”), weighing about 89 pounds, to perform photography and videography over private property.

Lee would likely be able to operate within the parameters of Part 107 except for the weight of the Shotover UAS. 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 and other civil purposes. The Coalition believes that granting this petition will help to advance this objective.

Lee will operate the UAS only within the visual line of sight of the remote pilot, and the UAS will be equipped with geo-fencing and a fail-safe return to home system.

With respect to Lee’s request for exemption from certain Part 61 requirements, the Coalition believes that obtaining a remote pilot certificate under Part 107 should be sufficient for an operation under section 333. With the adoption of Part 107, the FAA should accept a remote pilot certificate in lieu of a Part 61 airman certificate. Some of Lee’s pilots hold only a private, recreational, or sport pilot certificate and thus need an exemption to conduct commercial operations, which FAA has routinely granted.

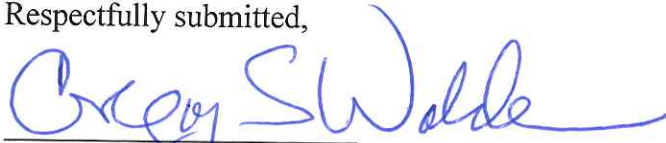
Lee seeks exemption from certain Part 91 requirements, from which FAA has granted many section 333 exemptions. For example, FAA has accepted GPS as an acceptable alternative to an altimeter; the UAS will have a barometric sensor to be used with the GPS. Seeking an exemption

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

from the 20-minute fuel reserve requirement makes sense for a UAS with operational endurance of only 10 minutes. Most of the Part 91 requirements for which Lee seeks an exemption are not included in Part 107.

The Small UAV Coalition supports Lee's petition in consideration of the safety commitments contained in the petition, the operational parameters and the additional operational limitations stated in its petition. Accordingly, the Coalition supports Lee's petition for exemption.

Respectfully submitted,



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