



SMALL UAV
COALITION
*A Partnership for
Safety & Innovation*

October 10, 2018

Mr. Dan Elwell
Acting Administrator
Federal Aviation Administration
800 Independence Avenue SW
Washington, DC 20591

Dear Acting Administrator Elwell,

On October 5, 2018, the President signed into law the FAA Reauthorization Act of 2018 (“the Act”), tasking the Federal Aviation Administration (“FAA”) with a number of initiatives to further advance unmanned aircraft systems (“UAS”) integration in the United States. These initiatives include initiating rulemakings, issuing guidance, making certain determinations, setting up pilot programs, developing plans, and conducting studies or issuing reports. Congress provided deadlines to meet many of these requirements. The [Small UAV Coalition](#), the leading policy organization representing commercial UAS operators, manufacturers, and end users, recognizes the FAA has finite resources to address these directives and would like to offer the full support and substantial participation of its members in assisting the FAA in timely compliance with these requirements.

Members of the Small UAV Coalition offer unique technical and policy expertise and as such, have participated in every advisory committee, task force, and working group the FAA has set up since 2015 to address UAS integration. Members are also actively participating in the UAS Integration Pilot Program and the UTM System Pilot Program. Coalition members have significant interest continuing to participate in any collaborative government-industry initiative to advance the safe and secure integration of UAS operators and operations into the National Airspace System (“NAS”).

Among the UAS provisions in the Act, we list the following requirements where the Coalition and its members offer our assistance to the responsible FAA offices and officials to help the FAA meet the congressional deadlines.

- Update rules to authorize carriage of property for compensation or hire (section 348)
- Proposed rule to implement section 2209 (section 369)
- Development of an online aeronautical knowledge test (section 349)
- Determination if certain UTM services can be operated before completion of UTM implementation plan

- Report to Congress on UAS use by fire departments and emergency services (section 359)
- FAA website providing information on commercial UAS operations (section 379)
- Report (with NTIA and FCC) to Congress on use of spectrum (section 374)


Two additional provisions that do not carry a deadline are critical to the safe and secure integration of UAS operations into the NAS. The Coalition and its members are prepared to meet with responsible FAA offices and officials to assist.

- Establishing a process to accept industry consensus safety standards (section 345)
- Updating guidance and developing best practices to use UAS to assist first responders (section 352)

Mindful of the need to move quickly to comply with three congressional directives, the Coalition is available to meet with FAA offices and officials as soon as mutually convenient dates can be set.

Thank you for your consideration.

Sincerely,



Gregory S. Walden
Aviation Counsel
Small UAV Coalition