

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

IN THE MATTER OF

Petition of Powers Flight Group for Exemption

Docket No. FAA-2018-0574

COMMENTS OF THE SMALL UAV COALITION

**Gregory S. Walden
McGuireWoods Consulting, LLC
2001 K Street NW, 4th floor
Washington, DC 20006
*Counsel to the Small UAV Coalition***

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The Small UAV Coalition¹ is pleased to provide its comments in support of the petition by the Powers Flight Group (“Powers”) for an exemption to operate the HSE-UAV AG V6A+ v2, an unmanned aircraft weighing more than 55 but less than 75.3 pounds with payload, for crop spraying, aerial imaging and 3D agricultural modeling operations in remote areas.

Unmanned Aircraft Systems (“UAS”) offer a safe and efficient means of conducting a variety of agricultural operations. Among the benefits Powers cites are the elimination of risk to a pilot, reduced chemical usage, reduced operator and other human exposure to chemicals, reduced noise impacts, and a significant reduction in the cost as compared with manned helicopters or fixed wing aircraft. 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, including UAS that weigh more than 55 pounds. The Coalition believes that granting this petition will help to advance this objective.

The UAS was formerly named the Beijing TT Aviation Technology Co. Ltd. M6A Pro. The M6A Pro has logged well over one million hours worldwide with reportedly a reportedly accident-free safety record. Powers notes that three governments and several universities are among the operators of the M6A, now renamed, with a weight under 55 lbs.

With respect to Powers’ request for exemption from certain Part 61 and Part 137 requirements relating to pilot certification, the Coalition believes that obtaining a remote pilot certificate under Part 107 should be sufficient for an operation under section 333, including an operation under Part

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

137. With the adoption of Part 107, the FAA should accept a remote pilot certificate in lieu of a Part 61 airman certificate and exempt such a certificated pilot from the Part 137 pilot requirements. The Coalition is pleased that the FAA has recently adopted this position. See Exemption No. 17936 to DroneSeed Co., FAA-2017-1157 (Aug. 13, 2018).

Powers seeks exemption from certain Part 91 requirements, from which FAA has granted many section 333 exemptions. Powers is willing to comply with the conditions and limitations the FAA imposed when granting a section 333 exemption to Yamaha to conduct agriculture operations with an unmanned aircraft weighing more than 55 lbs.

The Small UAV Coalition supports Powers' petition in consideration of its agreement to comply with the conditions and restrictions the FAA has imposed on Yamaha, the many safety features detailed in its petition, including the operation is a closed-access environment, within the visual line of sight of the remote pilot (with the assistance of a visual observer) and at very low altitudes, between 15 and 50 feet AGL. Accordingly, the Coalition supports Powers' petition for exemption.

Respectfully submitted,



Gregory S. Walden

McGuireWoods Consulting, LLC

2001 K Street NW, 4th floor

Washington, DC 20006

202-872-2928

gwalden@mwcllc.com

Counsel to the Small UAV Coalition

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