

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

**EXTERNAL MARKING REQUIREMENT FOR
SMALL UNMANNED AIRCRAFT – INTERIM FINAL RULE**

Docket No. FAA-2018-1084

COMMENTS OF THE SMALL UAV COALITION

**Gregory S. Walden
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March 7, 2019

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The Small UAV Coalition¹ is pleased to provide its comments in support of the FAA’s Interim Final Rule (IFR) that requires small unmanned aircraft to be marked externally. 84 Fed. Reg. 3669 (Feb. 13, 2019). In particular, the IFR amends 14 C.F.R. §48.205 to require the unique registration number to be legibly displayed on the external surface of small unmanned aircraft (UAS), or drones.

The Coalition agrees with the FAA that the minimal cost to display an external marking is far outweighed by eliminating the remote risk that a law enforcement officer or first responder may sustain injury by opening a compartment on the drone to locate a registration number. The Coalition also supports the FAA’s findings of “good cause” under the Administrative Procedure Act to dispense with notice-and-comment procedures as well as to make the IFR effective on fewer than 30 days.

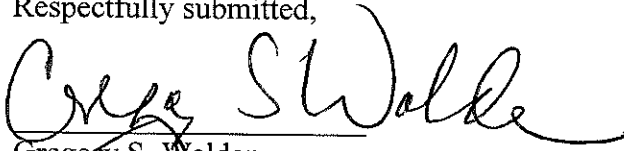
With respect to the costs of this IFR, we believe many, if not most UAS, are marked externally. For those UAS marked only on the inside, it is simple to display an external marking under the IFR. Preexisting section 48.205, which is not being revised, requires only that the marking be legible and affixed “by any means necessary to ensure that it will remain affixed for the duration of flight.” See 14 C.F.R. §48.205(a) & (b). The FAA notes that this IFR does not specify a particular external surface upon which the registration number must be placed. 84 Fed. Reg. at 3671. Accordingly, the cost of complying with this IFR should be negligible.

The FAA is preparing to issue a proposed rule requiring drones to be equipped with remote identification. The Coalition urges the FAA to not only issue this proposed rulemaking without further delay, but also to incorporate the UAS registration number as part of the unique

¹ Members of the Small UAV Coalition are listed at www.smalluavcoalition.org.

identifier in alignment of the pending ASTM Remote ID standard to promote transparency and accountability.

Respectfully submitted,

A handwritten signature in black ink that reads "Gregory S. Walden". The signature is written in a cursive style with a horizontal line underneath the name.

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