

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

IN THE MATTER OF

Petition of Bell Helicopter Textron Inc. for Exemption

Docket No. FAA-2019-0104

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 Bell Helicopter Textron Inc. (“Bell”) for an exemption to operate its APT70 unmanned aircraft system (“UAS”) pursuant to a cooperative agreement with NASA. The APT70 is a vertical takeoff and landing (“VTOL”) UAS weighing 320 lbs. that holds an experimental category airworthiness certificate. As such, its operations are limited to research and development (“R&D”). Bell proposes to operate its UAS beyond the visual line of sight (“BVLOS”) and up to altitudes of 1,200 feet above ground level (“AGL”) over sparsely populated areas in Plano County, Texas, and over the Choctaw Nation in Oklahoma.

Unmanned aircraft systems offer a safe and efficient means of conducting a variety of operations. 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. This includes operations of UAS over 55 lbs. and operations over 400 feet AGL. The Coalition also supports NASA UAS R&D work and therefore supports Bell’s NASA-funded operations.

Bell’s pilots will hold a private pilot certificate, which FAA has previously approved for operation under section 333 of the FAA Modernization of 2012 (codified at 49 U.S.C. 44807). For BVLOS operations, Bell will use Visual Observers to maintain communication with the remote pilot, including when operating a chase aircraft.

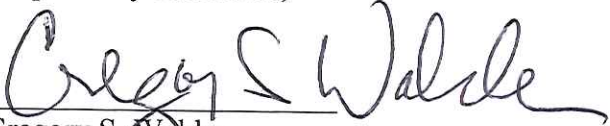
Bell will employ a redundant command and control (“C2”) system operating on a different frequency than the primary C2 link. It will use Visual Observers and a Ground-Based Detect and Avoid (GBDAA) system that will inform the remote pilot of any aircraft in the area.

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

Bell has performed a risk analysis, which appears to be similar to the FAA's proposed risk methodology for operations over people. While the Coalition has opposed this risk methodology in comments on the FAA's Notice of Proposed Rulemaking ("NPRM") as unduly conservative, it notes that Bell's operations will satisfy that test.

For the reasons stated above and in Bell's petition, Bell has made a strong case that its R&D operations will be conducted safely. Accordingly, the Coalition requests the FAA to grant Bell's petition for exemption.

Respectfully submitted,



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