

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

IN THE MATTER OF

Petition of DroneSeed Co. for Amendment to Exemption No. 17936A

Docket No. FAA-2017-1157

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 DroneSeed Co. (“DroneSeed”) for an amendment to Exemption No. 17936A to allow for extended visual line of sight operations (“EVLOS”) in which the pilot in command or visual observer is able to observe and clear the surrounding airspace at all times. DroneSeed previously obtained an exemption to operate three UAS models over 55 lbs. (68.9, 98.8, and 115 lbs.) and to allow its remote pilot to operate up to five drones of the same model simultaneously.

Unmanned aircraft systems (UAS) 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 extended visual line of sight operations. The Coalition believes that granting this petition will help advance this objective.

Post-wildfire restoration is difficult and risky work given the steep and rugged, hazardous terrain. Using drones instead of humans or manned aircraft to revegetate land will eliminate the risk to workers and allow the work to be completed efficiently, in a fraction of the time it would take human beings to do this work.

DroneSeed’s operations will be at very low altitudes (as low as three meters AGL) above rural, forested areas. DroneSeed will ensure that road access is blocked during UAS operations and a pre-flight ground and/or aerial survey will ensure that the operating area is clear of people and animals. The pilot in command (PIC) will verify the area is clear and identify the location of any obstacles and buffer zones for routes. Crew members will maintain positive communication

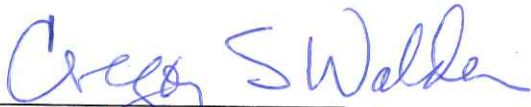
¹ Members of the Small UAV Coalition are listed at www.smalluavcoalition.org.

during all phases of flight. DroneSeed has submitted to the FAA procedures by which the PIC or visual observer will be able to observe and clear the airspace immediately above the UAS at all times during operations. By “clearing the airspace,” the Coalition assumes that, as required in Exemption No. 17936A, DroneSeed will coordinate with Air Traffic Control and yield the right of way to any manned aircraft.

In section 361 of the FAA Reauthorization Act of 2018, Congress directed the FAA to provide a report, by October 5, 2019, evaluating which provisions of Part 137 should apply to UAS operations for aerial spraying of chemicals for agricultural purposes. Granting this and similar exemption petitions will enable the FAA to gather data from UAS operators for this required report.

In sum, the Small UAV Coalition supports DroneSeed’s petition for amendment, in consideration of the many safety features detailed in its petition and the particular operational environments where UAS operations will eliminate the risk to persons who would otherwise be engaged in post-wildfire restoration efforts on foot. Accordingly, the Coalition requests the FAA grant DroneSeed’s petition for an amended exemption.

Respectfully submitted,



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