

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

IN THE MATTER OF

Petition of American Aerospace Technologies, Inc. for Exemption

Docket No. FAA-2018-0864

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 American Aerospace Technologies, Inc. (“AATI”) for an exemption to allow it to operate the Harris Aerial HX8 XXL unmanned aircraft system (“UAS”) with takeoff weight of not more than 150 pounds, for asset inspection and construction support as well as emergency support for first responders.²

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 in the near term permit the operation of UAS – including large UAS – within and beyond the line of sight, with varying degrees of autonomy, for commercial and other civil purposes. The Coalition believes that granting this petition and other petitions seeking to operate heavier drones will help advance this objective.

AATI has been safely operating UAS under Certificates of Authorization for public entities for eight years. AATI will operate below 400 AGL, within the Visual Line of Sight of the remote pilot, and with the assistance of a Visual Observer, who will have clear view of the UAS and will be in constant communication with the pilot in command. The UAS will operate in a “restrictive environment,” in that it will operate over private property only the consent of the property owner. The HX8 XXL is equipped with three redundant modes of autopilot, fail safe return-to-home technology, and a first- person view (“FPV”) camera. The use of a UAS instead of a manned helicopter for these tasks eliminates the risk to the crew as well as reduces the risk to persons on the ground. Thus, any perceived increase in risk because of the weight of the UAS is sufficiently mitigated.

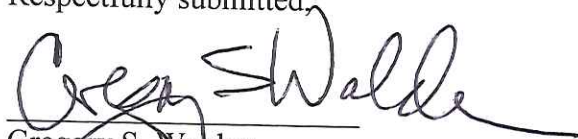
¹ Members of the Small UAV Coalition are listed at www.smalluavcoalition.org.

² While AATI requests an exemption under section 333, that section has been replaced by 49 U.S.C. §44807.

AATI's pilot will hold a Part 107 remote pilot certificate, and will have completed private pilot ground school. The FAA has asked whether AATI will be seeking airman certification under Part 61, seeding confirmation from AATI that its pilots "will all meet the level of safety that compliance with the requirements of Part 61 ensures." While the FAA, before the publication of the Part 107 final rule, required section 333 exemption holders to use only pilots with an airman certificate, the Coalition believes a Part 61 airman certificate is not necessary, in light of the equivalent level of safety involved in the combination of Part 107 certification and Part 61 ground school. AATI does not seek to operate outside of the parameters in which Part 107 operators use pilots without a Part 61 airman certificate. 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), and believes AATI should receive the same relief.

The Small UAV Coalition supports AATI's petition, in consideration of the many safety features detailed in its petition and the particular operational environments in which it will operate. Accordingly, the Coalition requests the FAA grant AATI's petition for exemption.

Respectfully submitted,



Gregory S. Walden
McGuireWoods Consulting, LLC
2001 K Street NW, 4th floor
Washington, DC 20006
202-857-2928
gwalden@mwellc.com
Counsel to the Small UAV Coalition

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