

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

IN THE MATTER OF

Petition of Innova Flight, LLC for Exemption

Docket No. FAA-2019-0243

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***

July 12, 2019

Filed with www.regulations.gov

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

IN THE MATTER OF

Petition of Innova Flight, LLC for Exemption

Docket No. FAA-2019-0243

COMMENTS OF THE SMALL UAV COALITION

The Small UAV Coalition¹ is pleased to provide its comments in support of the petition by Innova Flight, LLC d/b/a Innova Flight Training and Systems (“Innova”) for an exemption to allow it to operate its Sandstorm unmanned aircraft system (“UAS”) with takeoff weight of not more than 55 pounds, as part of Innova’s Flight Instruction Program. Innova seeks an exemption under section 333 because its UAS may be operated with payload that increases the UAS’s weight to over 55 lbs.²

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 in the near term permit the operation of UAS – including UAS over the Part 107 limit – 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.

Innova states that its Sandstorm UAS received an experimental category airworthiness certificate in 2011 and has been operating since that time without accident or incident. Innova states that its training operations will be flown below 400 AGL, within the visual line of sight of the remote pilot, in a “controlled and sterile area away persons and property not involved in the operation.” The Sandstorm is equipped with an advance autopilot system that can be flown in four modes” stabilized, return to home, circle, or navigation. It will file a NOTAM 24 hours before each daily flight and call the nearest control tower.

Innova’s pilots will hold a Part 61 private pilot certificate. Innova seeks an exemption from the dual controls requirement for flight instruction. The Coalition agrees that remote piloting of the

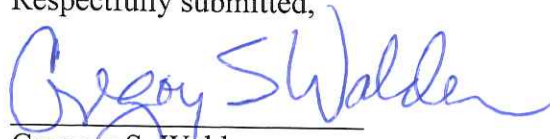
¹ Members of the Small UAV Coalition are listed at www.smalluavcoalition.org.

² While Innova requests an exemption under section 333, that section has been replaced by 49 U.S.C. §44807.

UAS obviates dual controls, and an exemption is in order. Innova also seeks an exemption from the limitation on commercial flights by private pilots and the second class medical certification requirement. FAA has waived both requirements for UAS operations in uncontrolled airspace, and it should grant the request exemptions to Innova in consideration of the operating environment and the nature of flight instruction.

The Small UAV Coalition supports Innova's other requests for relief, in consideration of the many safety features detailed in its petition and the particular operational environment in which it will operate, as well as the fact that FAA has granted the requested relief in many previous cases. Accordingly, the Coalition requests the FAA grant Innova'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@mwcllc.com
Counsel to the Small UAV Coalition

July 12, 2019