

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

IN THE MATTER OF

Petition of Leading Edge Associates, Inc. for Exemption

Docket No. FAA-2019-0275

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 Leading Edge Associates, Inc. (“Leading Edge”) for an exemption under section 44807 to allow Leading Edge to operate up to four² PrecisionVision small unmanned aircraft systems (“UAS”) during the day and at night and beyond the visual line of sight of the pilot, who will hold a remote pilot certificate under Part 107.

Leading Edge holds section 333 exemptions and a Part 137 certificate authorizing it to conduct agriculture operations, including spraying in remote operating environments. The PrecisionVision 35 UAS weighs over 55 lbs. but not more than 150 lbs.³

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 aircraft heavier than 55 lbs. The Coalition believes that granting this petition will help advance this objective.

In its petition, Leading Edge recites the many benefits of using small UAS to perform mosquito and noxious weed control as compared with using humans, All Terrain Vehicles (ATVs), or manned aircraft. The risk of death, personal injury, or disease is reduced considerably, at lower costs to all involved, and with reduced emissions. In recognition of these benefits, Congress, in

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

² The summary of Leading Edge’s petition in the Federal Register states that petitioner would “simultaneously operate two PrecisionVision UAS with one operator.” 84 Fed. Reg. 35449 (July 23, 2019).

³ Because the PrecisionVision 35 weighs 79 lbs., we assume the 150 lbs. maximum includes the payload.

section 361 of the FAA Reauthorization Act of 2018, 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.

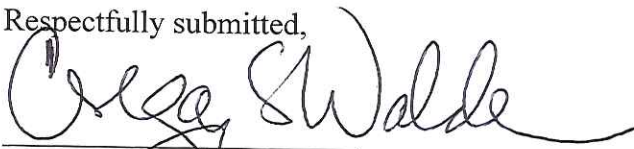
Although Leading Edge's petition suggests some of its pilots hold commercial pilot certificates, its petition requests permission to use a pilot who holds a Part 107 remote pilot certificate. While the FAA, before publication of the Part 107 final rule, required section 333 exemption holders to use only 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 training specific to the agriculture operations Leading Edge pilots will conduct. The Coalition is pleased that the FAA previously adopted this position in Exemption No. 17936 to DroneSeed Co., FAA-2017-1157 (Aug. 13, 2018), and believes Leading Edge should receive the same relief.

Leading Edge will abide by the conditions and limitations FAA has imposed in authorizing night operations and operation of multiple UAS by a single remote pilot. The petition does not explicitly discuss how it will safely operate its UAS beyond the visual line of sight of the remote pilot, but it appears that a visual observer will assist and that operations will be conducted in unpopulated or sparsely populated, controlled environments.

As for operations of UAS over 55 lbs., Leading Edge explains the safety features of the PrecisionVision UAS and the special qualifications of its pilots to conduct these agricultural operations.

In sum, the Small UAV Coalition supports Leading Edge's petition for exemption, 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 the agricultural operation on foot, ATV, or with manned aircraft. Accordingly, the Coalition requests the FAA grant Leading Edge's petition for exemption.

Respectfully submitted,



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