



**SMALL UAV
COALITION**
*A Partnership for
Safety & Innovation*

August 26, 2019

Honorable Daniel K. Elwell
Deputy Administrator
Federal Aviation Administration
Designated Federal Official
Drone Advisory Committee

Michael Chasen
Industry Co-Chair
Drone Advisory Committee

Dear Deputy Administrator and Mr. Chasen,

The Small UAV Coalition¹ responds to the invitation the Drone Advisory Committee (DAC) extended at its June 6, 2019 meeting to submit suggestions as to (1) how manufacturers and operators could voluntarily equip unmanned aircraft systems (UAS) with remote identification technology ahead of a remote identification (ID) final rule, (2) what types of incentives the Federal Aviation Administration (FAA) could provide to encourage industry to voluntarily equip UAS with remote ID; and (3) whether there are any other drivers to promote widespread equipage (Tasking #1).

As the FAA has recognized, the need to address remote ID requirements is foundational to further advancement of opportunities for UAS operations at scale. The Coalition has long advocated for a requirement that drones be equipped with remote ID technology. Several Coalition members participated in the FAA's Remote Identification and Tracking Aviation Rulemaking Committee ("ARC"), which issued its report in October 2017, and in ASTM Group F-38 Committee's development of remote ID standards. Earlier this year, the Coalition submitted a set of specific [recommendations](#) for inclusion in the FAA's proposed rule, one of which is to adopt the ASTM remote ID standards.

The sooner remote ID is implemented, the sooner safety, security, and privacy benefits can be realized. The Coalition is also keenly aware that the rulemaking process typically takes up to a year or more to get to final rule. For these reasons, the Coalition strongly supports actions to promote remote ID implementation in advance of the initiation of the rulemaking process, which

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

we remain hopeful will begin in September. To promote implementation of remote ID equipage in advance of the FAA's adoption of a final rule, the Coalition offers the proposals outlined herein.

Voluntary Equipage

Remote ID technology is available now and in use by many UAS operators. The UAS industry is ready to demonstrate the effectiveness of the technology and its potential to deliver immediate safety, security, and privacy benefits at a reasonable cost.

The Coalition urges that any pre-rule implementation promoted by the DAC be consistent with the ASTM standards as it represents a well-considered approach to deployment of remote ID.² The Coalition suggests that in conjunction with such promotion, the DAC also implore the UAS industry publicly to commit to remote ID equipage in advance of the completion of the rulemaking process. The Coalition's member companies stand ready to make such a public commitment once the DAC makes its determination.

To demonstrate the potential of remote ID in addressing a number of concerns with UAS operations, the Coalition also recommends the DAC urge the FAA to sponsor live remote ID demonstrations to key interest groups, such as Congress, Federal law enforcement and homeland security agencies, State and local law enforcement officials, and the general public. In addition, the FAA should support and acknowledge live demonstrations conducted by the UAS industry. Live remote ID demonstrations are critical to public acceptance of commercial drone operations in a range of use cases, including over people and beyond visual line of sight in both remote or urban environments. The FAA should work with industry and State, and local agency participants in the Integrated Pilot Program to facilitate these demonstrations. The Coalition members are prepared to explore such presentations with the FAA to help ensure they are conducted safely. Such opportunities would benefit from the DAC's endorsement.

The Coalition members are prepared to explore such presentations with the FAA in partnership with Federal, State, and local agencies to facilitate these demonstrations and help ensure they are conducted safely. Such opportunities would benefit from the DAC's endorsement.

Incentives

In order to incentivize companies to implement remote ID in compliance with the ASTM standards, the Coalition believes the FAA should provide priority consideration to Part 107 waiver and section 44807 exemption petitions filed by UAS operators that have implemented the ASTM remote ID standards. In addition to expedited processing, the Coalition believes that remote ID equipage should be considered favorably in evaluating the merits of a waiver or exemption request because it increases the margin of safety of the drone operations.

² While Tasking #1 refers to remote identification standards projects by SAE International and ANSI/Consumer Technology Association (CTA), only the ASTM standards project is complete and suitable for the FAA's adoption.

Other drivers

Tasking #1 also asked whether there are any other drivers that could lead to widespread remote ID equipage before the FAA publishes a final rule. The Coalition believes that a statement from the FAA that its rule will be based on and consistent with the ASTM standards would encourage the UAS industry to begin equipage in compliance with these standards.

In summary, FAA adoption of the ATSM standards in advance of the FAA's final remote ID rule, industry equipage commitments and public demonstrations, and FAA's commitment to expedite and favorably consider waiver and exemption applications, will spur broad industry implementation of remote ID equipage before the rulemaking process is complete. As an incentive to equip UAS with remote ID, the Coalition recommends that the FAA offer expedited and favorable treatment of waiver and exemption applications. The Coalition looks forward to moving forward with this opportunity and is available to meet with the Lead and members of Task Group 1 at a mutually convenient time.

Respectfully submitted,



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Small UAV Coalition

Copy to:

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