

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

IN THE MATTER OF

Petition of A-Cam Aerials, LLC for Exemption

Docket No. FAA-2019-0477

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 A-Cam Aerials, LLC (“A-Cam”) for an exemption under section 44807 to allow A-Cam to operate the Watts Innovations MFD5000 unmanned aircraft system (“UAS”) weighing over 55 lbs., but under 100 lbs., for aerial photography and cinematography, using remote pilots who will hold a remote pilot certificate under Part 107.

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.

A-Cam’s petition requests permission to use pilots who hold a Part 107 remote pilot certificate. Before it published the Part 107 final rule, the FAA 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 operations A-Cam 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 A-Cam should receive the same relief.

As for operations of UAS over 55 lbs., A-Cam explains the many safety features of the UAS in its petition and has demonstrated its commitment to safety in conducting 500 operations safely under waivers and exemptions. A-Cam operations will be conducted only in a closed set or sparsely populated area.

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

In sum, the Small UAV Coalition supports A-Cam's petition for exemption, in consideration of the many safety features detailed in its petition and the particular operational environment where UAS operations will eliminate the risk to persons on the ground and to manned aircraft. Accordingly, the Coalition requests the FAA grant A-Cam's petition for exemption.

Respectfully submitted,



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