

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

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**IN THE MATTER OF**

**Petition of University of Florida Unmanned Aircraft Systems Research Program for  
Exemption**

**Docket No. FAA-2019-0504**

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**COMMENTS OF THE SMALL UAV COALITION**

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September 25, 2019

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**COMMENTS OF THE SMALL UAV COALITION**

The Small UAV Coalition<sup>1</sup> is pleased to provide its comments in support of the petition by University of Florida Unmanned Aircraft Systems Research Program (“UF-UASRP”) for an exemption under section 44807 to allow UF-UASRP to operate an electric vertical takeoff and landing (“VTOL”) unmanned aircraft system (“UAS”) weighing 195 lbs. for research and development purposes, 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.

UF-UASRP requests permission to use pilots who hold a Part 107 remote pilot certificate in lieu of Part 61 airman certification. Before it published the Part 107 final rule, the FAA required section 333 exemption holders to use only pilots with a Part 61 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 UF-UASRPs will conduct, as well as the low risk environment in which the UAS will be operated. 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 UF-UASRP should receive the same relief.

As for operations of UAS over 55 lbs., UF-UASRP explains that its UAS will operate in an area entirely fenced in, below 400 feet, within the visual line of sight of the remote pilot, and away

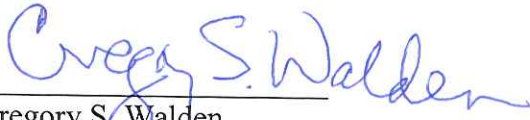
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<sup>1</sup> Members of the Small UAV Coalition are listed at [www.smalluavcoalition.org](http://www.smalluavcoalition.org).

from controlled airspace and populated areas, as well as at least ¼ mile from any land not owned by the university.

In sum, the Small UAV Coalition supports UF-UASRP's petition for exemption, in consideration of the 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 UF-UASRP's petition for exemption.

Respectfully submitted,



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