

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

IN THE MATTER OF

Petition of Wing Aviation LLC for Amendment to Exemption No. 18163

Docket No. FAA-2018-0835

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***

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The Small UAV Coalition¹ is pleased to provide its comments in support of the petition by Wing Aviation LLC (“Wing”) for an amendment to Exemption No. 18163 to enable Wing to train its pilots, visual observers and nest managers per an education, training, and experience regimen tailored to Wing’s Part 135 package delivery operations.

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 adapting the manned aircraft pilot education and experience requirements to the different risk profile of small UAS operations. The Coalition believes that granting this petition will help advance this objective.

Specifically, Wing seeks an exemption from the requirement in 14 C.F.R. §135.109(b) for a pilot in command to remain as the only PIC for the duration of a flight. Wing has designed a system for handover procedures in consideration of the capability for one or more remote pilots to operate multiple UAS at the same time, to ensure there are no gaps and that all safety responsibilities are taken care of.

Wing also seeks an exemption from the requirement in 14 C.F.R. §135.243(b) that pilots must hold a commercial pilot certificate. The Coalition agrees that a remote pilot certificate under Part 107 supplemented by an FAA-approved training program will achieve a greater level of safety as it will be tailored to the specific UAS and Wing’s unique method of package delivery operations.

Regarding the medical certification requirements for pilots, check airmen, and flight instructors, under 14 C.F.R. §§135.243, 135.337, and 135.338, respectively, the Coalition supports Wing’s

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

request for an exemption to allow its pilots and check airmen to meet medical and fitness for duty requirements set forth in Wing's manual and Condition and Limitation 75 in Exemption No. 18163. Wing notes that FAA recently has revised medical standards for lower risk manned aircraft operations and that its UAS operations pose an inherently lower risk than operations of even a light sport aircraft that can weigh well in excess of 1,000 lbs.

Wing also seeks an exemption from certain training and checking requirements that are impractical for UAS operations (i.e., requiring tasks to be performed from both the left and right seat per 14 C.F.R. §135.339) and that Wing believes are not appropriate for the nature of its operations (transition, upgrade, and differences training under 14 C.F.R. §135.341). The Coalition supports these exemptions for the reasons stated in Wing's petition.

Accordingly, the Coalition requests the FAA grant Wing's petition for an amendment to Exemption No. 18163.

Respectfully submitted,



Gregory S. Walden
McGuireWoods Consulting, LLC
2001 K Street NW, 4th floor
Washington, DC 20006
202-857-2928
gwalden@mwellc.com
Counsel to the Small UAV Coalition

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