

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

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**IN THE MATTER OF**

**Petition of Daniel Waghorne for Exemption**

**Docket No. FAA-2019-0305**

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**COMMENTS OF THE SMALL UAV COALITION**

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November 21, 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 Daniel Waghorne (“Mr. Waghorne”) on behalf of Kennedy Remotes for an exemption under section 44807 to allow Mr. Waghorne to operate the MFD-5000 unmanned aircraft system (“UAS”) weighing around 75 lbs. or less “fully loaded,” to conduct photography and videography.

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.

Mr. Waghorne’s petition seeks permission to use as pilot in command (“PIC”) a pilot with either a commercial, private, recreational, or sport pilot certificate. Thus, he seeks an exemption from the requirement to hold a commercial pilot certificate in order to conduct commercial operations. The FAA has previously granted exemptions from this requirement, in consideration of knowledge and training skills specific to the operations he and his pilots will conduct. Mr. Waghorne states that each PIC must complete 40hours of in-house training on the specific UAS and five hours of flight time on the specific UAS. The Coalition believes this knowledge and training provides more than an equivalent level of safety.

As for operations of UAS over 55 lbs., Mr. Waghorne will operate the MFD-5000 below 400 feet above ground level (“AGL”), within Class G airspace, within the visual line of sight of the PIC (“VLOS”), and not directly over any person. Mr. Waghorne will obtain consent of the owner or agent of any vehicle or structure before operating closer than 500 feet to such vehicle or structure.

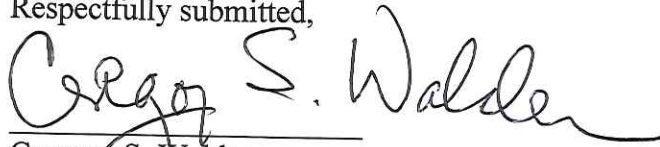
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<sup>1</sup> Members of the Small UAV Coalition are listed at [www.smalluavcoalition.org](http://www.smalluavcoalition.org).

With respect to the airworthiness of the UAS, Mr. Waghorne states that the MFD-5000 is equipped with geo-fencing, a redundant flight controls system, and fail-safe return-to-home system.

In sum, the Small UAV Coalition supports Mr. Waghorne's petition for exemption, in consideration of the safety of his UAS, operating within the parameters of Part 107, and the particular operational environment where UAS operations will be conducted. Accordingly, the Coalition requests the FAA grant Mr. Waghorne's petition for exemption.

Respectfully submitted,



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