

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

IN THE MATTER OF

Petition of Moose Eye Bye LLC for Exemption

Docket No. FAA-2019-0922

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 Moose Aye Bye LLC (“Moose”) for an exemption pursuant to 49 U.S.C. 44807 to allow Moose to operate simultaneously up to five Hyllo AG-116 unmanned aircraft weighing about 88 lbs. for aerial spraying operations over privately-owned cropland.

Unmanned aircraft systems (UAS) offer a safe and efficient means of conducting a variety of operations, including aerial spraying for agricultural purposes. 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 (BVLOS), with varying degrees of autonomy, for commercial and other civil purposes. This includes UAS weighing over 55 lbs. The Coalition believes that granting this petition will help advance this objective.

Moose’s UAS will operate below 200 feet AGL – generally much lower – and at speeds lower than 30 miles per hour and over pre-determined private or controlled, uninhabited land. Some parts of the flight may be BVLOS simply because of topography, but only for a short time and at a short distance. Using drones instead of humans or manned aircraft to conduct these aerial spraying operations will eliminate the risk to workers and allow the work to be completed efficiently, at a significantly reduced environmental footprint, and in a fraction of the time it would take human beings to do this work. Moose explains that it has operated the Hyllo AG-116 UAS in Central America for over 2,000 hours without mishap. Moose also explains how in addition to its situational awareness, a UAS will avoid risks commonly posed by manned crop duster fixed-wing aircraft and helicopters, each weighing several thousand pounds compared with the 88-lb. Hyllo AG-116.

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

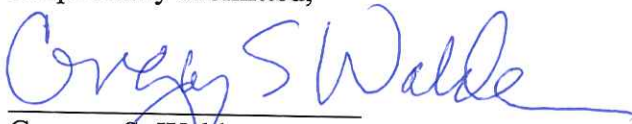
Moose states that it will comply with the conditions and limitations in Exemption 17936 (DroneSeed), Exemption 11448 (Yamaha), and Exemption 18009 (Powers Flight Group). The Coalition supported all three petitions for exemption and agrees that compliance with the conditions and limitations set forth in these exemptions will achieve an equivalent level of safety.

Moose seeks an exemption to use a pilot holding a remote pilot certificate with small UAS rating. Moose states that its pilots will comply with the knowledge and skills requirements in Part 137, and the UAS-specific pilot training requirements. The Coalition believes that holding a remote pilot certificate under Part 107 should be sufficient for an operation under section 44807. With the adoption of Part 107, in which a remote pilot certificate with small UAS rating is accepted in lieu of a Part 61 airman certificate, the FAA should similarly accept that certificate, with UAS-specific additional training requirements, for UAS over 55 lbs., as well as certain Part 137-related skills and knowledge requirement.

In section 361 of the FAA Reauthorization Act of 2018, Congress directed the FAA to provide a report, by October 5, 2019, evaluating which provisions of Part 137 should apply to UAS operations for aerial spraying of chemicals for agricultural purposes. To our knowledge, that report has not yet been submitted. Granting this and similar exemption petitions will enable the FAA to gather data from UAS operators for this required report.

In sum, the Small UAV Coalition supports Moose's petition for exemption, in consideration of the many safety features detailed in its petition and the particular operational environment where its operations will avoid the risk to persons. Accordingly, the Coalition requests the FAA grant Moose's petition for exemption.

Respectfully submitted,



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