

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

IN THE MATTER OF

Petition of ArgenTech Solutions, Inc. for Exemption

Docket No. FAA-2020-0024

COMMENTS OF THE SMALL UAV COALITION

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February 17, 2020

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The Small UAV Coalition¹ is pleased to provide its comments in support of the petition by ArgenTech Solutions, Inc. (“AgTS”) for an exemption under section 44807 to allow AgTS to operate its FireEye Vertical Takeoff and Landing (“VTOL”) fixed-wing unmanned aircraft system (“UAS”) weighing approximately 71 lbs., using remote pilots who will hold a private certificate. AgTS intends to operate its UAS to perform wildlife monitoring and search and rescue in the continental United States and Alaska as part of a fire monitoring contract with the Department of the Interior.

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.

AgTS’s petition requests permission to use pilots who hold a private pilot certificate instead of a commercial 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 agrees that a Part 61 commercial pilot certificate is not necessary, in light of the equivalent level of safety involved in the combination of Part 61 private pilot certification and training specific to the operations AgTS pilots will conduct, including a requirement to fly a fixed-wing UAS at least 25 hours with at least three takeoffs and landings.

As for operations of UAS over 55 lbs., AgTS will operate within the visual line of sight of the remote pilot, assisted by a trained observer. It will fly only in rural areas, away from airports, not

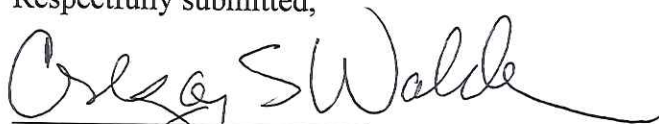
¹ Members of the Small UAV Coalition are listed at www.smalluavcoalition.org.

over any non-participating person, and under 400 feet AGL. With respect to the airworthiness of the UAS, the Coalition supports the use of section 44807 to authorize commercial operations without type, production or airworthiness certificates, and defers to the FAA's evaluation of AgTS's Flight Manual and other materials submitted confidentially.

In sum, the Small UAV Coalition supports AgTS's petition for exemption, in consideration of operational environment where UAS operations will be conducted, the operational limitations it will observe, and its experience under contracts with the Departments of Defense (through Boeing and Insitu) and Interior.

Accordingly, the Coalition requests the FAA grant AgTS's petition for exemption.

Respectfully submitted,



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