

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

IN THE MATTER OF

Petition of Wild Rabbit Productions, Inc. for Exemption

Docket No. FAA-2019-1108

COMMENTS OF THE SMALL UAV COALITION

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April 21, 2020

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The Small UAV Coalition¹ is pleased to provide its comments in support of the petition by Wild Rabbit Productions, Inc. (“Wild Rabbit”) for an exemption pursuant to 49 U.S.C. 44807 to allow Wild Rabbit to operate the Freefly Systems, Inc. Alta X unmanned aircraft system (“UAS”), weighing more than 55 lbs. but less than 100 lbs., for closed-set filming.

UAS offer a safe and efficient means of conducting a variety of operations, including filming for cinematography, motion pictures, and television. 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.

Wild Rabbit’s UAS will operate below 400 feet above ground level (“AGL”), normally at altitudes of 25 to 100 feet AGL, and within a closed “sterile” set where persons who are not involved with the filming will not be present. All persons involved in the filming will provide consent; no UAS operation will take place above uninvolved, non-consenting persons. All flights will be within the visual line of sight of the remote pilot, who will be assisted by a Visual Observer with whom the remote pilot will be in constant contact.

Wild Rabbit seeks an exemption to use a certificated sport pilot for commercial operations. FAA routinely granted section 333 exemptions to allow a sport pilot to conduct commercial UAS operations, and should grant the requested exemption here, especially in light of the remote pilot’s extensive experience.

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

The Coalition notes that Wild Rabbit's operation could be conducted under Part 107 without requiring any waiver, except for the weight of the UAS. Thus, the Coalition believes that Wild Rabbit's operations can be conducted safely without being required to comply the provisions in Parts 45, 61, and 91.

In sum, the Small UAV Coalition supports Wild Rabbit'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 uninvolved persons. Accordingly, the Coalition requests the FAA grant Wild Rabbit's petition for exemption.

Respectfully submitted,



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