

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

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**IN THE MATTER OF**

**Petition of Old Abe Aviation LLC for Exemption**

**Docket No. FAA-2020-0056**

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**COMMENTS OF THE SMALL UAV COALITION**

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April 21, 2020

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The Small UAV Coalition<sup>1</sup> is pleased to provide its comments on the petition by Old Abe Aviation LLC (“Old Abe”) for an exemption from certain Part 107 requirements to enable pilots holding a Part 61 airman certificate (other than a student pilot) to benefit from particular Part 107 ground training provisions.

The Coalition has supported a number of petitions for exemption to allow pilots holding a Part 107 remote pilot certificate with small UAS rating to operate UAS over 55 lbs. Such operations are outside of Part 107 and would otherwise require pilots operating such UAS to hold a Part 61 airman certificate, and in particular a commercial pilot certificate for commercial operations. The Coalition notes that the FAA has granted many Section 333 exemptions to operators using a pilot holding only a private or student pilot certificate.

The Coalition further 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 remote pilot certificate, with UAS-specific additional training requirements, for UAS over 55 lbs.

With respect to Old Abe’s petition, the relief requested is from Part 107 requirements that apply to Part 61 certificate holders who wish to conduct commercial operations under Part 107. In particular, Old Abe seeks relief from the flight maneuvers portion of the initial issuance of a Part 61 certificate and the recency requirements in 14 C.F.R. 107.63 and 107.65. Old Abe proposes to substitute additional aeronautical knowledge training for these requirements, pointing out that Part 107 otherwise does not require any flight training.

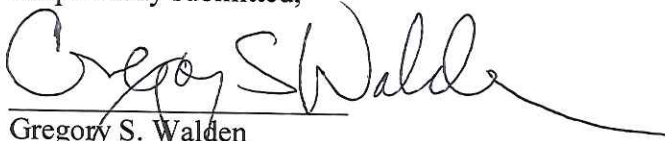
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<sup>1</sup> Members of the Small UAV Coalition are listed at [www.smalluavcoalition.org](http://www.smalluavcoalition.org).

As the Coalition generally supports the use of a Part 107 remote pilot certificate for UAS pilots operating drones that are modestly heavier than 55 lbs., the Coalition would also generally support an exemption that allows a Part 61 airman to benefit from the Part 107 requirements for pilot knowledge and currency.

The Coalition notes that Old Abe, as a certified instructor, seeks relief on behalf of “current and future students.” The Coalition defers to the FAA whether the breadth of this requested relief suggests a revision to Part 107 should be entertained in place of, or subsequently to the grant of, an exemption.

Respectfully submitted,

A handwritten signature in black ink that reads "Gregory S. Walden". The signature is written in a cursive style and is positioned above a horizontal line.

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