

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

IN THE MATTER OF

Petition of Monar Aero Inc. for Exemption

Docket No. FAA-2019-1111

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 Monar Aero Inc. (“Monar Aero”) for an exemption pursuant to 49 U.S.C. 44807 to allow Monar Aero to operate an unmanned aircraft weighing more than 55 lbs., but less than 100 lbs., for closed-set filming.

Unmanned aircraft systems (“UAS”) offer a safe and efficient means of conducting a variety of operations, including filming for motion pictures, music, web, or corporate videos, television programs and commercials, and still photography. 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.

Monar Aero’s UAS will operate below 400 feet above ground level (“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 uninformed, 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. Monar Aero notes that it has conducted UAS operations under section 333 exemptions for nearly five years without incident.

Monar Aero will use pilots holding a Part 61 private pilot certificate who will be further trained for the particular operations per the Monar Aero flight operations and procedural manuals. The

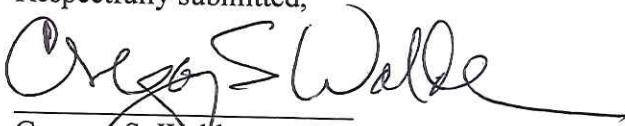
¹ Members of the Small UAV Coalition are listed at www.smalluavcoalition.org.

FAA has granted many exemptions allowing a Part 61 certificated private pilot to conduct commercial UAS operations, and on this showing Monar Aero should receive a similar exemption.

The Coalition notes that Monar Aero's operation could be conducted under Part 107 without requiring any waiver, except for the weight of the UAS. Thus, the Coalition believes that Monar Aero'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 Monar Aero'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 Monar Aero's petition for exemption.

Respectfully submitted,



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