

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

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IN THE MATTER OF

Petition of UAVantage, LLC for Exemption

Docket No. FAA-2020-0127

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COMMENTS OF THE SMALL UAV COALITION

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The Small UAV Coalition<sup>1</sup> is pleased to provide its comments in support of the petition by UAVantage, LLC. (“UAVantage”) for an exemption pursuant to 49 U.S.C. 44807 to allow UAVantage 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.

UAVantage’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.

UAVantage seeks an exemption to use a pilot holding a remote pilot certificate with small UAS rating under Part 107, and seeks to adapt Part 61 proficiency and currency requirements as additions to the Part 107 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

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

of a Part 61 airman certificate, the FAA should similarly accept that certificate, with UAS-specific additional training requirements, for UAS over 55 lbs., like the ones offered in UAVantage's petition.

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

Respectfully submitted,



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