

**SMALL UAV
COALITION**
*A Partnership for
Safety & Innovation*

June 22, 2020

Honorable Daniel K. Elwell
Deputy Administrator
Federal Aviation Administration
Designated Federal Official
Drone Advisory Committee

Michael Chasen
Industry Co-Chair
Drone Advisory Committee

Re: Small UAV Coalition comments in support of UTM CONOPS 2.0

Dear Deputy Administrator Elwell and Mr. Chasen,

The Small UAV Coalition¹ submits these comments in support of the Federal Aviation Administration's UTM CONOPS 2.0, released on March 2, 2020. The Coalition and several of its members served on Task Group 7 ("Task Group" or "TG 7"), which the Drone Advisory Committee ("DAC") requested to review UTM CONOPS 2.0. The Coalition is pleased that the DAC accepted TG 7's recommendations at its June 19 meeting, and we look forward to publication of UTM CONOPS 3.0 when it is available.

As a general matter, the Coalition agrees with the consensus view of the Task Group that UTM CONOPS 2.0 is a significant improvement over the initial CONOPS document, and that version 2.0 can be further improved through clarification of several matters, as outlined in the TG 7 report, in a version 3.0. The Coalition agrees with TG 7's list of additional benefits of UTM, to be included in section 2.2.

Among the areas of widespread support from TG 7 members, the Coalition particularly supports the UTM CONOPS 2.0 description of a federated UTM system, the establishment of performance requirements for UTM service suppliers ("USSs") and certain services. Moreover, the Coalition strongly supports the recognition of the significant contribution that the standards development organizations (such as ASTM) have made and will continue to make to the safety and efficiency of UTM architecture. ASTM has been working on consensus-based standards for a range of technical issues, including remote ID and pilot training, over the last four years to provide a safe

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

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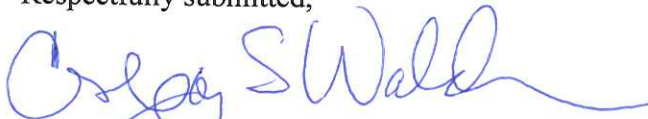
and secure airspace for unmanned aircraft operations. That work is rightly recognized in the UTM CONOPS 2.0.

The Coalition also supports a limited, defined function of the Flight Information Management Systems (“FIMS”), as suggested in UTM CONOPS 2.0, section 2.3.2.4, in which FIMS serves as an interface to authorized data, but does not serve as a communications or approval bridge between or among USSs.

With respect to the role of remote identification (“remote ID”), the Coalition recognizes the pendency of the remote ID rulemaking, but agrees with TG 7 that the next version of UTM CONOPS should describe how broadcast remote ID will tie into the UTM system.

The Coalition looks forward to continuing to work with the DAC and the FAA to further advance the UTM CONOPS.

Respectfully submitted,



Gregory S. Walden
Aviation Counsel
Small UAV Coalition

Copy to: David Silver, Task Group 7 Lead