

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

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**IN THE MATTER OF**

**Petition of Bridger Aviation Services LLC for Exemption**

**Docket No. FAA-2019-1033**

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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 Bridger Aviation Services LLC (“Bridger”) for an exemption under section 44807 to allow Bridger to operate the Bridger FVR-90 unmanned aircraft system (“UAS”) weighing 117 lbs. for a variety of purposes, including assisting the public during natural disasters and evacuations and assisting firefighting efforts by spotting new fire starts outside of areas covered by a Temporary Flight Restriction. Bridger intends to operate its UAS for the Department of Interior and other businesses, conducting a variety of surveys, including cattle counts, wildlife management, burned area recovery, pipelines, and transmission lines.

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, with varying degrees of autonomy, for commercial and other civil purposes. This includes operations of aircraft heavier than 55 lbs. and operations to assist firefighters. The Coalition believes that granting this petition will help advance this objective.

Bridger intends to operate beyond the visual line of sight (“BVLOS”) of the remote pilot, in sparsely populated areas. The petition also states it may operate up to 14,000 feet AGL, and intends to operate like BNSF railroad, which also operates the FVR-90 BVLOS. The FVR-90 is equipped with a Mode C transporter, ADC-B transmitter, and an altimeter. Bridger’s safety justification for these operations is contained in manuals and other materials provided to the FAA confidentially, and thus the Coalition defers to the FAA’s evaluation of these materials.

Bridger’s petition notes that it will use pilots who hold a Part 61 airman certificate with a class 2 medical certificate. Each pilot will have completed 500 hours operating a UAS over 100 lbs. The

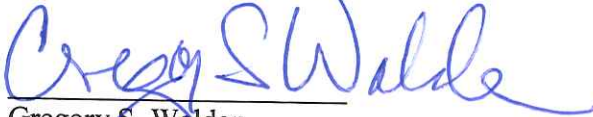
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<sup>1</sup> Members of the Small UAV Coalition are listed at [www.smalluavcoalition.org](http://www.smalluavcoalition.org).

FAA has previously accepted a private pilot certificate in lieu of a commercial certificate in consideration of the lower risk involved and in recognition of value of training tailored to the UAS flight profile. The Coalition agrees that this certification and training regimen should suffice.

In sum, the Small UAV Coalition supports Bridger's petition for exemption, in consideration of the safety features detailed in its petition, the relatively lower risk environment, and its safety record in conducting manned and unmanned aircraft operations. Accordingly, the Coalition requests the FAA grant Bridger's petition for exemption.

Respectfully submitted,



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