

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

IN THE MATTER OF

Petition of Avitas, Inc. for Amendment to and Extension of Exemption No. 17992A

Docket No. FAA-2018-0263

COMMENTS OF THE SMALL UAV COALITION

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The Small UAV Coalition (“Coalition”)¹ is pleased to provide comments in support of the petition by Avitas, Inc. (“Avitas”), a Baker Hughes venture, for an amendment to and extension of Exemption No. 17992A. The Coalition supported Avitas’s original petition for section 333 exemption in an August 23, 2018 filing in this docket, and wishes to incorporate by reference its comments in support of that petition in these comments in support of the current petition filed under section 44807.

Members of the Small UAV Coalition support advancing regulatory and policy changes to permit UAS operations beyond visual line of sight (“BVLOS”), with varying degrees of autonomy, for commercial and other civil purposes. Avitas operates its remotely piloted rotorcraft to inspect oil and gas facilities in the Permian Basin in Texas. The particular restricted operational environment permits BVLOS operations without risk to persons on the ground and other precautions are taken, including the issuance of a NOTAM, to address any risk to other aircraft that may be in the vicinity.

Avitas’s exemption is currently set to expire August 23, 2021. Avitas seeks an extension for two years. The Coalition supports this and other extensions of exemption authority, including converting section 333 exemptions into section 44807 exemptions. The Coalition notes that the Secretary of Transportation’s authority under section 44807 expires September 2023. Extending Avitas’s exemption for two years will allow time to extend the exemption again before the sunset of section 44807 if the FAA does not have in place a rule authorizing BVLOS operations by that time.

Avitas seeks an amendment to add an additional operating area within the Permian Basin. The Coalition supports this amendment as Avitas will adhere to the same safety protocols in this area.

¹ Members of the Small UAV Coalition are listed on the Coalition’s website, www.smalluavcoalition.org.

Avitas seeks an amendment to operate briefly over road crossings. Avitas will conduct a risk assessment before conducting such operations. The Coalition supports UAS transient operations over moving vehicles provided that these operations may be conducted safely, and for the reasons the Coalition stated in opposing a categorical prohibition on operations over moving vehicles in the FAA's Operations over People proposed rule.

Avitas also seeks an amendment to use a Part 107 certificated remote pilot with small UAS instead of a Part 61 certificated pilot. The petition cites the precedent in the FAA's grant of exemption to Droneseed, which the Coalition supported at the time. The Coalition adds that it has long supported allowing Part 107 certificated pilots to operate small UAS for commercial purposes under section 44807 provided the pilots are also specifically trained to operate the particular UAS. Avitas has a training regimen for its pilots that is tailored to the UAS and includes a minimum number of hours and takeoffs and landings. Also, Avitas will ensure that its pilots adhere to the standards set for external load operations under Part 133. Accordingly, the Coalition supports this request. For the reasons stated above, the Coalition supports granting Avitas's petition for amendment to and extension of Exemption No. 17992.

Respectfully submitted



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