

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

IN THE MATTER OF

Petition of California Institute of Technology for Exemption

Docket No. FAA-2020-0431

COMMENTS OF THE SMALL UAV COALITION

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The Small UAV Coalition (“Coalition”)¹ is pleased to provide its comments in support of the petition by the California Institute of Technology (“Caltech”), Graduate Aeronautical Labs (“Galcit”) for an exemption pursuant to 49 U.S.C. 44807 to allow Caltech to operate the Atlas, an unmanned aircraft originally manufactured by Skylift Global, for operations within the Aircraft Rescue and Firefighting (“ARFF”) Training Center at San Bernardino International Airport in Southern California. Caltech seeks to demonstrate the utility of the unmanned aircraft system (“UAS”) to public sector first responders, including firefighters and law enforcement.

Unmanned aircraft systems offer a safe and efficient means of conducting a variety of operations, including assisting emergency responders. 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”) of the remote pilot, 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.

The Atlas weighs 100 lbs. at takeoff, and can operate up to 300 lbs. with a rigidly-secured payload. Operations will be within the Visual Line of Sight of the remote pilot, aided by a visual observer, and remain below 400 feet Above Ground Level (“AGL”) at speeds under 87 knots. These operations will be conducted under the supervision or oversight of San Bernardino Airport staff, and there will be no access to non-participating persons. In a letter of support, the San Bernardino International Airport Authority notes that “the selected area is outside of any published approaches and traffic patterns. . . .”

Caltech seeks an exemption from certain airworthiness requirements in Part 27 governing normal category rotorcraft. Caltech notes that it seeks the same authority Skylift Global obtained under section 333, including the conditions and limitations in Exemption No. 16683. The Coalition

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

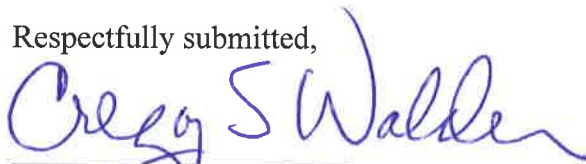
notes that while that exemption and section 333 have both expired, section 44807, included in the FAA Reauthorization Act of 2018, provides the same authority to the FAA to authorize operations without requiring an airworthiness certificate. The Coalition supports an exemption from Part 27 (and Part 21) requirements in the limited circumstances of these training operations.

In the 2018 Reauthorization Act Congress also directed the FAA to promote the use of UAS in support of firefighting and emergency services. Section 353 recognizes as a “sense of Congress” that drones could significantly assist firefighting and emergency response, and section 359 required the FAA to conduct a study of the use and benefits of such drone operations. Section 353 follows the enactment of section 2207 of the FAA Extension, Safety, and Security Act of 2016, which directed the FAA to develop guidance on authorizing UAS operations in aid of emergency response activities, including firefighting. The Coalition believes that Caltech’s proposed operations to assist San Bernardino Airport’s ARFF operations are decidedly in the public interest and should be supported.

The Coalition also notes that the FAA selected Memphis International Airport for the UAS Integration Pilot Program in large part because of the several use cases for drones on airport property. Similarly, granting Caltech’s petition is in furtherance of developing safe and reliable protocols for on-airport operations.

In sum, the Small UAV Coalition supports Caltech's petition for exemption, in consideration of the safety features detailed in its petition and the particular operational environment where UAS operations will avoid the risk to persons and to other aircraft. Accordingly, the Coalition requests the FAA grant Caltech's petition for exemption.

Respectfully submitted,



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