

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

IN THE MATTER OF

Petition of Overwatch Aero, LLC for Amendment of Exemption No. 18596

Docket No. FAA-2018-0857

COMMENTS OF THE SMALL UAV COALITION

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The Small UAV Coalition (“Coalition”)¹ is pleased to provide its support of the petition by Overwatch Aero, LLC (“Overwatch Aero”) for an amendment to Exemption No. 18596 to extend the exemption; increase the maximum takeoff weight of the L3 Harris Latitude HQ-90C drone to 130 lbs.; provide blanket approval for operations up to 1,200 feet AGL in Class G airspace; allow night Visual Flight Rules (“VFR”) outside of temporary flight restrictions (“TFRs”); and allow flight operations other than as an active emergency response flight.

Unmanned aircraft systems (“drones”) offer a safe and efficient means of conducting a variety of operations. Members of the Small UAV Coalition share an interest in advancing regulatory and policy changes that will permit the operation of drones 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 drones weighing over 55 lbs. and operations at altitudes higher than 400 feet AGL. The Coalition believes that granting this petition will help advance this objective.

Overwatch Aero’s authority under Exemption 18596 permits it to operate the HQ-90C drone weighing up to 121 lbs. The proposed weight increase of 9 lbs., is only marginal and should not pose any increase in risk of operations.

Regarding the proposal to operate in Class G airspace up to 1,200 feet AGL, the Coalition notes that a blanket Certificate of Authorization (“COA”) would reduce the FAA’s workload without any material increase in risk, given the use of visual observers to maintain constant sight of the drone, high visibility paint and LED lights to illuminate the drone, the publication of a NOTAM at least 24 hours before the operation, and Overwatch Aero’s monitoring of the potential of non-participating aircraft in the vicinity.

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

Overwatch Aero is not requesting blanket authority to conduct night VFR operations, but only the ability to request a COA during specific times and airspace. These operations will allow Overwatch Aero to better support first responders with incident prevention and mitigation efforts. The drones will be fitted with high-intensity LED navigation lights and anticollision strobe lights, and the drone pilots will receive special training for night operations. For these operations, too, a NOTAM will be filed at least 24 hours in advance. With these safety features, the Coalition supports this request.

Overwatch Aero seeks to broaden the scope of its operations from wildfire mapping and search and rescue to include wildfire mitigation, illegal firework mapping, surveying of critical infrastructure, and assisting law enforcement. The Coalition supports the broadest scope of use cases for which the drone can be put to use safely and effectively.

In sum, the Small UAV Coalition supports Overwatch Aero's petition for amendment of Exemption 18596, in consideration of the many safety features of the HQ-90C drone and other safety measures described in the petition. Accordingly, the Coalition requests the FAA grant Overwatch Aero's petition for exemption in full.

Respectfully submitted,



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