

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

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**IN THE MATTER OF**

**Petition of General Atomics Aeronautical Systems, Inc. for Exemption**

**Docket No. FAA-2020-0984**

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**COMMENTS OF THE SMALL UAV COALITION**

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January 21, 2021

Filed with [www.regulations.gov](http://www.regulations.gov)

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**COMMENTS OF THE SMALL UAV COALITION**

The Small UAV Coalition (“Coalition”)<sup>1</sup> is pleased to provide comments in support of the petition by General Atomics Aeronautical Systems, Inc. (“GA-AS”) for an exemption from 14 C.F.R. 91.109(a) to allow GA-AS to conduct crew training for United States government contractors on GA-AS’s Predator unmanned aircraft system (“UAS”), which has an Experimental Category Special Airworthiness Certificate, without dual controls, at or above 2,500 feet Above Ground Level (“AGL”). GA-AS intends to seat a Certified Flight Instructor (CFI)-rated instructor adjacent to the trainee who will be seated as the pilot operator control station.

The Coalition supports this petition, in light of GA-AS’s experience, its safety protocols, and the particular operational environment that carries a very low ground risk. As GA-AS notes, the Air Force has been conducting training this way for 25 years, and thus it is fitting also to allow a government contractor to conduct training in this manner.

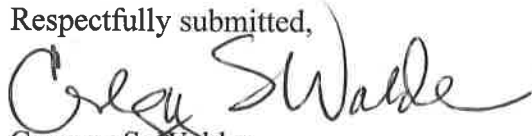
Members of the Small UAV Coalition support advancing regulatory and policy changes to permit UAS operations beyond visual line of sight (“BVLOS”), with varying degrees of autonomy, for commercial and other civil purposes. In this setting, the Coalition supports expanding permissible crew training by having the remote pilot and instructor seated next to each other.

For the reasons stated above, the Coalition supports granting GA-AS’s petition in full.

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<sup>1</sup> Members of the Small UAV Coalition are listed on the Coalition’s website, [www.smalluavcoalition.org](http://www.smalluavcoalition.org).

Respectfully submitted,



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January 21, 2021