

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

IN THE MATTER OF

Petition of Country Club Lawn & Tree Specialist, LLC for Exemption

Docket No. FAA-2021-0231

COMMENTS OF THE SMALL UAV COALITION

**Gregory S. Walden
Dentons US LLP
1900 K Street NW
Washington, DC 20006
*Counsel to the Small UAV Coalition***

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The Small UAV Coalition (“Coalition”)¹ is pleased to provide its support of the petition by Country Club Lawn & Tree Specialist, LLC (“Country Club”) for an exemption pursuant to 49 U.S.C. 44807 to allow Country Club to operate the Hylío AG-122 drone weighing around 143 lbs. (with payload) maximum takeoff weight, for commercial agricultural operations and vegetation control. Country Club seeks to operate up to three drones simultaneously.

Uncrewed aircraft systems (“UAS” or “drones”) offer a safe and efficient means of conducting a variety of operations, including commercial agricultural 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. The Coalition believes that granting this petition will help advance this objective.

The Hylío AG-122 operates lower than 100 feet AGL, typically 10 feet above the crop canopy. Hylío is a U.S. company that has operated over 5,000 flights in Central America. The AG-122 contains several safety features that address any risk to persons, property, or other aircraft, including rotor fail protection, ground software system, return-to-launch, geofencing, redundant GPS, telemetry, among others. In particular, the Hylío is protected against the risks of lost link or fly-aways. The FAA has granted several exemptions to petitioners seeking to operate the AG-122.

For operations involving a drone heavier than 55 lbs., the Coalition has supported many petitions to conduct low altitude agricultural spraying and vegetation control. These operations typically do not occur close to persons not involved with the operation, nor close to vehicles or structures not owned by the operator or the owner of the farm. Accordingly, the ground risk as well as air risk are negligible. Also, Country Club is not seeking an exemption to operate beyond the visual line of sight of the remote pilot, thus avoiding the risk of collision with another aircraft.

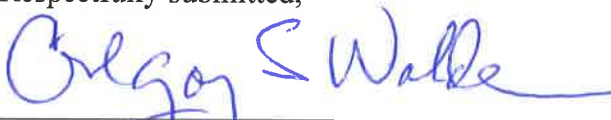
¹ Members of the Small UAV Coalition are listed at www.smalluavcoalition.org.

Country Club seeks to use a pilot who holds a remote pilot certificate under Part 107. The Coalition has consistently recommended the FAA allow pilots trained to operate drones under 55 lbs. also operate heavier drones, rather than be required to obtain a Part 61 pilot certificate, and the FAA has granted such relief.

The Coalition also supports Country Club's request to operate up to three AG-122 drones simultaneously, in consideration of the safety case made in the petition and the very low altitude and low risk operational environment.

In sum, the Small UAV Coalition supports Country Club's petition for exemption, in consideration of the many safety features of the Hyllo Ag-122 and the particular operational environment. Accordingly, the Coalition requests the FAA grant the petition for exemption in full.

Respectfully submitted,



Gregory S. Walden
Dentons US LLP
1900 K Street NW
Washington, DC 20006
202-496-7436
gregory.walden@dentons.com