

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

IN THE MATTER OF

Petition of IVM Solutions, LLC for Exemption

Docket No. FAA-2020-0765

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 IVM Solutions, LLC (“IVM”) for an exemption pursuant to 49 U.S.C. 44807 to allow IVM to operate three drone models, the HSE-UAV M6A Pro G200, weighing no more than 83 lbs.(with payload) maximum takeoff weight, and the DJI AGRAS T-16 and DJI AGRAS T-20, weighing no more than 97.2 and 100.75 lbs., respectively, for vegetation control for utility, pipeline, and railroad right of way, and row crop applications. IVM also seeks to operate at night and closer than 500 feet from any structures or vehicles.

Unmanned 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 three drone models each operates lower than 100 feet AGL, typically 10 feet above the crop canopy. These drones contain several safety features that address any risk to persons, property, or other aircraft, including obstacle avoidance, and geofencing, among others.

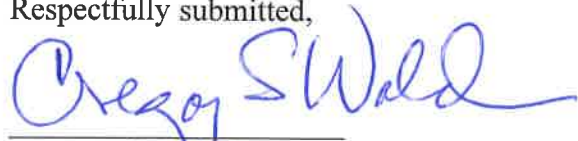
For operations involving a drone heavier than 55 lbs., the Coalition has supported many petitions to conduct low altitude agricultural spraying and crop monitoring. These operations typically do not occur close to persons not involved with the operation, nor close to vehicles or structures not owned by the operator or the owner of the farm. Accordingly, the ground risk as well as air risk are negligible. The Coalition supports the request to operate closer than 500 feet to vehicles. There is no reason why very low altitude crop spraying cannot occur close to motor vehicles traveling along an adjacent road, especially with the safety features of these drones.

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

IVM 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.

In sum, the Small UAV Coalition supports IVM's petition for exemption, in consideration of the many safety features of these drone models as well as the particular operational environment. Accordingly, the Coalition requests the FAA grant IVM's petition for exemption in full.

Respectfully submitted,



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