

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

IN THE MATTER OF

Petition of Ohana Drone for Exemption

Docket No. FAA-2021-0043

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 Ohana Drone (“Ohana”) for an exemption pursuant to 49 U.S.C. 44807 to allow Ohana to operate the DJI AGRAS T-16 drone weighing not more than 97.2 lbs. (with payload) maximum takeoff weight, for spray application of chemicals, fertilizers, and granular products for vegetation control for utility, pipeline, and railroad right of ways, and crops. Ohana also seeks to operate at night and closer than 500 feet from any structures or vehicles, and to operate up to two drones simultaneously by one remote pilot.

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 UAS 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 AGRAS T-16 drone operates lower than 100 feet AGL, typically 10 feet above the crop canopy. The AGRAS T-16 drone contains 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 the AGRAS T-16 drone.

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

Ohana 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 Ohana's petition for exemption, in consideration of the many safety features of the AGRAS T-16 drone and the particular operational environment. Accordingly, the Coalition requests the FAA grant Ohana's 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