

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

IN THE MATTER OF

Petition of Insitu, Inc. for Exemption

Docket No. FAA-2021-0746

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***

October 21, 2021

Filed with www.regulations.gov

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

IN THE MATTER OF

Petition of Insitu, Inc. for Exemption

Docket No. FAA-2021-0746

COMMENTS OF THE SMALL UAV COALITION

The Small UAV Coalition (“Coalition”)¹ is pleased to provide its support of the petition by Insitu, Inc. (“Insitu”) for an exemption to allow Insitu to operate the ScanEagle3 drone weighing around 85 lbs. maximum takeoff weight, for durability and reliability testing as part of the ScanEagle3’s type certification process, using a pilot who holds a remote pilot certificate under Part 107 rather than a pilot certificate under Part 61.

Uncrewed aircraft systems (“UAS” or “drones”) offer a safe and efficient means of conducting a variety of operations, including commercial 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 exemptions to advance the type certification process.

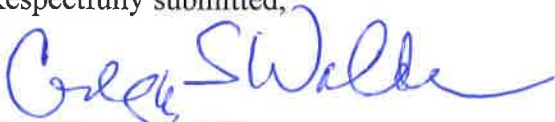
The Coalition has consistently recommended the FAA allow pilots holding a remote pilot certificate under Part 107 to operate drones heavier than the 55-lb. limit in Part 107, rather than be required to obtain a Part 61 pilot certificate, provided the remote pilot also completes the drone model- (platform-) specific training, and the FAA has granted such relief in more than a few instances. Here, Insitu remote pilots must successfully complete an eight-week qualification training program. Operations are conducted within an FAA-approved area in Class D airspace, and under an Experimental Category Airworthiness Certificate.

The Small UAV Coalition supports Insitu’s petition for exemption, in consideration of the Insitu- and ScanEagle3-specific training Insitu remote pilots must complete and to support drone type certification.

Accordingly, the Coalition requests the FAA grant Insitu’s petition for exemption.

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

Respectfully submitted,



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