

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

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**IN THE MATTER OF**

**Petition of Southern Helicopter Inc. for Exemption**

**Docket No. FAA-2021-0433**

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**COMMENTS OF THE SMALL UAV COALITION**

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The Small UAV Coalition (“Coalition”)<sup>1</sup> is pleased to provide its support of the petition by Southern Helicopter Inc. (“Southern”) for an exemption pursuant to 49 U.S.C. 44807 to allow Southern to operate the DJI AGRAS T-20 drone weighing not more than 105 lbs. (with payload) maximum takeoff weight, for spray application of chemicals, fertilizers, and pesticides. Southern also seeks to operate closer than 500 feet from persons, structures and vehicles, and closer than 100 feet from any structures or vehicles with the permission of the person with legal authority over the structure or vehicle.

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-20 drone operates at low altitudes. The AGRAS T-20 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 and air risks are negligible. Using a battery-powered drone in place of a piloted aircraft not only eliminates any risk to the pilot but also reduces environmental noise and emission impacts.

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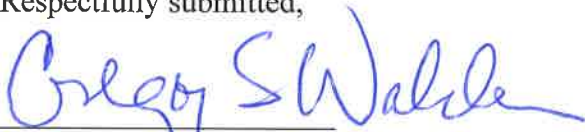
<sup>1</sup> Members of the Small UAV Coalition are listed at [www.smalluavcoalition.org](http://www.smalluavcoalition.org).

The Coalition supports the request to operate closer than 500 feet to non-participating persons where barriers or structures protect the person from the drone or dispensed material. The Coalition also 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 geo-fencing feature of the AGRAS T-20 drone. The Coalition also supports permitting Southern to operate closer than 100 feet from property or vehicles with the consent of the property or vehicle owner.

Southern 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, provided they are trained in operations of the particular drone modal and in dispensing agricultural materials and chemicals, as pilots for Southern will be.

In sum, the Small UAV Coalition supports Southern's petition for exemption, in consideration of the many safety features of the AGRAS T-20 drone and the particular operational environment of low altitude agriculture operations. Accordingly, the Coalition requests the FAA grant Southern's petition for exemption in full.

Respectfully submitted,



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