

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

IN THE MATTER OF

Petition of Victor Lee & Associates Inc. for Exemption

Docket No. FAA-2018-0183

COMMENTS OF THE SMALL UAV COALITION

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November 22, 2021

Filed with www.regulations.gov

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The Small UAV Coalition (“Coalition”)¹ is pleased to provide its general support of the petition by Victor Lee & Associates (“Lee”) for an exemption pursuant to 49 U.S.C. 44807 to allow Lee to operate the SHOTOVER U1 drone, upgraded to have a maximum takeoff weight of 132.2 pounds, for commercial creative visual photography and videography. The FAA granted Exemption No. 18881 authorizing Lee to operate SHOTOVER’s 89 lb. model. The only apparent difference in this petition is the weight of the drone.

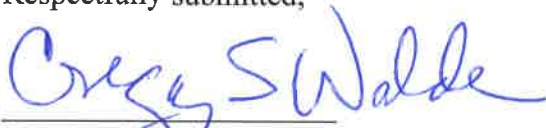
Unmanned aircraft systems (“UAS” or “drones”) offer a safe and efficient means of conducting a variety of operations, including commercial agricultural operations. Members of the Small UAV Coalition share an interest in advancing regulatory and policy changes that will permit the operation of UAS in the near term within and beyond the line of sight (“BVLOS”), with varying degrees of autonomy, for commercial and other civil purposes. This includes UAS weighing over 55 lbs. In comments filed on August 21, 2018, the Coalition supported Lee’s previous petition in Docket No. FAA-2018-0183, and believes that granting this petition will further advance this objective.

Lee’s operations will occur over private property with restricted access, with geo-fencing. Accordingly, the ground and air risks are negligible.

In sum, the Small UAV Coalition supports Lee’s petition for exemption, in light of the FAA’s grant of Exemption No. 18881, the safety features of the SHOTOVER U1, and the operational environment for these operations.

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

Respectfully submitted,



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