

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

IN THE MATTER OF

Petition of Skyways Air Transportation, Inc. for Exemption

Docket No. FAA-2020-1190

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***

November 23, 2021

Filed with www.regulations.gov

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

IN THE MATTER OF

Petition of Skyways Air Transportation, Inc. for Exemption

Docket No. FAA-2020-1190

COMMENTS OF THE SMALL UAV COALITION

The Small UAV Coalition (“Coalition”)¹ is pleased to provide its support of the petition by Skyways Air Transportation, Inc. (“Skyways”) for an exemption pursuant to 49 U.S.C. 44807 to allow Skyways to operate the Skyways V2.50 vertical takeoff and landing drone, weighing no more than 155 pounds, to conduct market research and demonstration flights.

Unmanned aircraft systems (“UAS” or “drones”) offer a safe and efficient means of conducting a variety of 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.

For operations involving a drone heavier than 55 lbs., the Coalition has supported many petitions to conduct low altitude operations in controlled environments, where both ground and air risks are minimal. Skyways proposes to operate under the requested exemption only in remote areas in Class G airspace. 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.

The Coalition notes that Skyways has a contract with the Department of Defense using the V2.20 variant model and has received “clearance” to operate “autonomous flights” for the Department of Navy using the V.2.50 model. Skyways is also seeking type certification. Skyways’ experience with the DOT and Navy provides assurance that Skyways’ operations will be conducted safely.

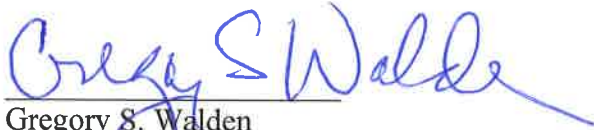
Skyways seeks to use a pilot who holds a Part 61 private pilot certificate as well as remote pilot certificate. The Coalition has consistently recommended the FAA allow pilots trained to operate

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

drones under 55 lbs. also operate heavier drones, rather than be required to obtain a Part 61 commercial pilot certificate, provided they are trained in operations of the particular drone model, as Skyways' pilot will be.

In sum, the Small UAV Coalition supports Skyways' petition for exemption, in consideration of the many safety features of the Skyways V.250 drone and the particular operational environment in remote areas in Class G airspace. Accordingly, the Coalition requests the FAA grant Skyways' 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