

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

IN THE MATTER OF

Petition of Google Research Climate and Energy Group for Exemption

Docket No. FAA-2020-0386

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 comments in support of the petition by the Google Research Climate and Energy Group, a division of Google, Inc. (“Google”), for an exemption pursuant to 49 U.S.C. 44807 to allow Google to operate the HSE-UAV M8A Pro, a vertical takeoff and landing (“VTOL”) unmanned aircraft manufactured by Beijing TT Aviation Technology Co. Ltd., weighing not more than 98.9 pounds, for monitoring to detect electrical transmission line faults that may start a wildfire. Initial testing will be confined to private property where no non-participating person is expected.

Unmanned aircraft systems offer a safe and efficient means of conducting a variety of operations, including assisting emergency responders. 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”) of the remote pilot, with varying degrees of autonomy, for commercial and other civil purposes. This includes UAS weighing over 55 lbs. The Coalition believes that granting this petition will help advance this objective.

The HSE-UAV M8A Pro weighs just under 55 lbs. empty weight, but with payload may weigh up to 98.8 pounds. Operations will be aided by a visual observer, and remain below 200 feet Above Ground Level (“AGL”), with spraying operations below 20 feet AGL. The FAA has previously approved the operation of this model of UAS under section 44807, and Google has agreed to comply with the conditions the FAA imposed on Exemption No. 18320.

Google seeks an exemption from certain requirements in Parts 61, 91, and 137. The petition lists many safety features, including equipment, training, and operational limitations. that will ensure an equivalent level of safety. The Coalition also supports the use of pilots who hold a remote pilot certificate and who receive enhanced training in the particular UAS model and operations

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

environment, in lieu of Part 61 airman certification. The FAA has routinely granted relief from Part 61 under these circumstances, and should do so here.

In the 2018 Reauthorization Act Congress directed the FAA to promote the use of UAS in support of firefighting and emergency services. Section 353 recognizes as a “sense of Congress” that drones could significantly assist firefighting and emergency response, and section 359 required the FAA to conduct a study of the use and benefits of such drone operations. Section 353 follows the enactment of section 2207 of the FAA Extension, Safety, and Security Act of 2016, which directed the FAA to develop guidance on authorizing UAS operations in aid of emergency response activities, including firefighting. There is no question that operating a UAS instead of a manned fixed-wing aircraft or helicopter poses a much lower risk to persons and property, with a much smaller carbon footprint. The Coalition believes that Google’s proposed operations are decidedly in the public interest and should be supported.

In sum, the Small UAV Coalition supports Google's petition for exemption, in consideration of the safety features detailed in its petition and the particular operational environment where UAS operations will avoid the risk to persons and to other aircraft. Accordingly, the Coalition requests the FAA grant Google's petition for exemption.

Respectfully submitted,



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