

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

IN THE MATTER OF

Petition of Wing Aviation LLC for Amendment to Exemption No. 18163A

Docket No. FAA-2018-0835

COMMENTS OF THE SMALL UAV COALITION

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May 17, 2021

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The Small UAV Coalition (“Coalition”)¹ is pleased to provide comments in support of the petition by Wing Aviation LLC (“Wing”) for an amendment to Exemption No. 18163A. Wing seek to expand its package delivery operations in several respects, including to (1) locate its regional pilots in command in a central hub; (2) stage its USD operations at multiple sites in an operating area (rather than a single nest); (3) extend the line check interval from 3 months to 12 months; and (4) modify language in several conditions and limitations in Exemption No. 18163A.

Members of the Small UAV Coalition support advancing regulatory and policy changes to permit UAS operations beyond visual line of sight (“BVLOS”), with varying degrees of autonomy, for commercial and other civil purposes. This includes enabling small package delivery operations to expand in numbers and operating areas to meet business and consumer demand and to provide manifold health and economic benefits to the general public.

The Coalition supports this petition, in light of Wing’s spotless safety record spanning thousands of flights in the United States and Australia, to further the objectives of the BEYOND program, and for the reasons set forth in Wing’s petition.

(1) Centralizing pilot in command functions will be more efficient without any reduction in safety. As Wing states, local ground personnel will continue to conduct preflight checks and other responsibilities. There is no technical reason to require a pilot in command to be physically co-located with the UA or operating area. Wing recognizes the potential human factors impact, and will enhance Crew Resource Management procedures to address any such concern.

(2) Wing intends to stage its UAs at multiple sites in an operating area in order to improve services to local businesses across a community. The Coalition does not believe the planned

¹ Members of the Small UAV Coalition are listed on the Coalition’s website, www.smalluavcoalition.org.

distribution of operations raises any safety issue. The pilot in command's level of awareness of the operating area and control of the UAs will not change.

(3) Wing notes that the FAA initially required a three-month interval for line checks, but more recently has allowed line checks at six-month intervals, with no concerns. Wing requests the line check interval to be extended to 12 months. The Coalition believes this is a reasonable request as it will align with Part 135, as Wing holds a Part 135 air carrier certificate, while reducing burdens to both FAA and Wing.

(4) Wing envisions receiving type certification of a UA model that is a derivative of the UA model now used in its package delivery operations but that will be similar in operational characteristics. To accommodate those changes, Wing asks to revise certain UAS-specific conditions and limitations in Exemption 18163A. References to a specific UA model will be made in the normal aircraft certification process. The Coalition supports these revisions, which are administrative in nature and do not raise any safety issue.

In sum, the Coalition recommends the FAA grant the requested amendments to Exemption 18163A. In doing so, FAA will further the shared goal of the FAA and UAS industry of repeatable, scalable, and economically viable UAS operations.

Respectfully submitted,



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