

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

IN THE MATTER OF

**Agency Information Collection Activities: Requests for
Comments: Clearance of a New Approval of Information
Collection: Unmanned Aircraft Systems (UAS) Market Survey**

Docket No. FAA-2020-1056

COMMENTS OF THE SMALL UAV COALITION

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February 25, 2021

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The Small UAV Coalition (“Coalition”)¹ is pleased to reiterate its support of a new information collection proposed in the above-captioned Notice to conduct an online survey to gather current practices for UAS pilots. On December 23, 2020, the Coalition initially provided comments in this docket in support of this proposed information collection. The Coalition appreciates the FAA’s response to the several suggestions the Coalition made in its most recent Federal Register notice. 86 Fed. Reg. 7165 (Jan, 26, 2021)..

In particular, the Coalition welcomes the opportunity to disseminate the survey more broadly to the UAS industry, once the FAA provides the survey link to the Coalition and other commenting organizations. 86 Fed. Reg. at 7166. The Coalition continues to believe that the FAA should notify all Part 107 waiver holders -- as well as all Section 44807 exemption holders -- of the existence of the survey. The FAA should also provide a link to the survey on the FAA’s Drone Zone website.

The Coalition reiterates its recommendation that the FAA develop the minimum knowledge, skills and abilities requirements based on the experience of drone operators to date, in consideration of the different risk profile presented by UAS air carrier operations compared with manned aviation with a human in the cockpit. The requirements should also consider the varying levels of autonomy of UAS air carriers, where remote pilots commonly manage a pre-programmed flight, as well as consider the requirements to operate more than one UAS at a time.

With respect to flight and duty time periods, the Coalition similarly recommends requirements tailored to the specific risks of fatigue for a remote pilot, whether operating one or more UAS at a time. The Coalition recommends the FAA endeavor to establish performance standards rather than the heavily prescriptive flight and duty time rules that currently apply to commercial air carrier operations conducted under Parts 121 and 135.

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

SMALL UAV COALITION COMMENTS

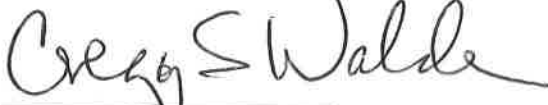
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With respect to the content of the survey, the Coalition endorses the specific questions suggested in comments submitted to the docket by Wing Aviation LLC (a Coalition member), with respect to maintaining vigilance, fatigue, and additional considerations.

The Coalition appreciates this opportunity to provide input on this market survey and would welcome a further opportunity to review the survey once it has been drafted.

Respectfully submitted,



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