

**BEFORE THE
DEPARTMENT OF TRANSPORTATION
OFFICE OF THE SECRETARY
WASHINGTON, D.C.**

IN THE MATTER OF

U.S. DOT Strategic Plan

Docket No. DOT-OST-2021-0140

COMMENTS OF THE SMALL UAV COALITION

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The Small UAV Coalition (“Coalition”)¹ is pleased to provide these comments on the draft DOT Strategic Plan Framework (“the Plan”) for FY 2022-2026, which includes strategic goals and objectives for the coming years. 86 Fed. Reg. 68720 (Dec. 3, 2021).

The Coalition supports each of the six goals and the proposed objectives designed to usher in a new era of transportation, rooted in safety. We also support President Biden’s recent Executive Order 14508 entitled “Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government,” 86 Fed. Reg. 71357 (Dec. 16, 2021), section 7 of which directs agencies to “(a) integrate activities to improve customer experience, as appropriate and consistent with applicable law, into their respective (i) agency strategic plans developed pursuant to section 306(a) of title 5, United States Code.” 86 Fed. Reg. at 71364. Specific comments are provided below.

Safety

DOT has appropriately identified safety as the first goal. The Coalition recommends that the Strategic Plan explicitly make safety the ultimate goal, and a prerequisite to allow consideration of the other goals. Safety must govern all other goals and objectives in the Plan. The Coalition further recommends that safety issues be assessed fairly without prejudice to newer industries and technologies as there should be a clear and fair method of determining what is and is not safe regardless of modality and history of an industry before DOT.

As such, the Plan should recognize the safety advances that are concomitant with a shift from legacy aviation and trucks to commercial drones, resulting in a significant reduction in risk to persons and property. The Coalition supports the use of Safety Management Systems (SMS), among other voluntary measures, to advance safety beyond regulations and enforcement actions.

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

Economic Strength & Global Competitiveness

The Coalition urges the Department and the Administration to make U.S. leadership in the safe and effective development and deployment of drones a top priority. Other nations are rushing ahead, intent on capturing the economic and societal benefits associated with drones for infrastructure, inspection delivery, disaster response, and public safety. The U.S. led the first century of aviation. It is critical that we lead the next century, which will be defined by highly automated and autonomous systems, such as the commercial drones made and operated by Small UAV Coalition's members. We also endorse the objective of global economic leadership, and specifically international collaboration on trade, standards, and research.

Harmonization promotes competitiveness by reducing regulatory friction. To that end, the U.S. should continue to work with the International Civil Aviation Administration (ICAO) and with the Joint Authorities for Rulemaking on Unmanned Systems (JARUS) to develop harmonized rules to enable the drone industry to deliver its manifold benefits around the world. The U.S. should continue to promote the standards work of ASTM, ANSI, and the International Standards Organization (ISO), among others.

The Coalition also notes the importance of supply chain resiliency. With respect to drones, we support skilling and reskilling initiatives that provide training in how to build, operate, and maintain drones, to ensure a sufficient number of trained workers in the coming years as drone operations grow to scale.

Equity

The Coalition supports the objectives to achieve the goal of reducing inequities and promoting "safe, affordable, and multimodal access to opportunities and services[.]" The Coalition notes that drone delivery promises to provide access to opportunities and services that may not currently be available to the disabled, infirm, or aged who are unable to drive or rely on family or friends to provide such opportunities and services.

The Coalition also supports the FAA's inclusive language initiative, and recommends that this initiative be expanded department-wide, including not only to the Office of the Secretary but also the other modal Administrations within the Department. The Coalition notes that the drone industry has already taken proactive steps to use gender-neutral language for internal business communications as well as public-facing communications, including petitions for waiver or exemption and other applications. The Coalition agrees with the FAA that language matters and that "embracing diversity and inclusion will have a significant impact on bringing all voices into the conversation to help further the FAA's mission." It is important to help ensure that no person feels excluded or marginalized due to the use of gender-based transportation terms.

Climate & Sustainability

The vast majority of commercial and recreational drones are battery-powered. They are not powered by fossil fuels and do not contribute to climate change. The Department should promote such climate-friendly technologies and advance the industry through risk-based regulation and certification.

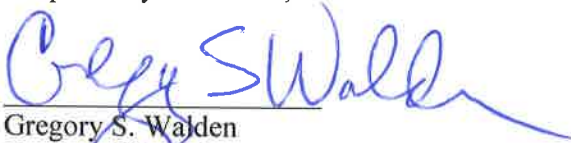
Transformation

In designing for the future, DOT and FAA should prepare for a future in which much if not most inspection and delivery services are provided by drones rather than fixed wing aircraft, trucks, or vans. This transformation has ramifications on the physical as well as network infrastructure needed to enable this transformation. DOT and FAA must support the development of vertiport design, construction, and operation, while it continues to develop and stand up an uncrewed aircraft traffic management (UTM) system, and ensure the development of safe and efficient airspace rules and policies.

Organizational Excellence

Most of the objectives to achieve this goal are addressed to internal department practices and policies. The Coalition supports the one objective that addresses decision-making, transparency, and accountability in developing data systems and tools. The Coalition believes that the FAA and OST can improve the level of transparency for rulemakings as well as other non-rulemaking activities such as certifications, exemptions, and waivers. While DOT websites have contributed to greater transparency in recent years, there is still room for improvement. For example, once an application or petition is filed, often weeks and months elapse before OST or the FAA provides notice of a disposition or status report. Another example relates to the use of data; in particular, how the agency intends to use the data in formulating a policy or making a decision.

Respectfully submitted,



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