

**BEFORE THE
DEPARTMENT OF AGRICULTURE
UNITED STATES FOREST SERVICE**

IN THE MATTER OF

**Information Collection: Forest Service Pilot and Aircraft Record
Forms**

OMB number 0596-0015

COMMENTS OF THE SMALL UAV COALITION

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September 20, 2021

Sent to paul.linse@usda.gov

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The Small UAV Coalition (“Coalition”)¹ is pleased to support the renewal, with revisions, of several forms proposed in the above-captioned Notice used in the Forest Service’s use of commercial aviation services for resource protection and project management. 86 Fed. Reg. 38266 (July 20, 2021). The Coalition recognizes that unmanned aircraft systems (“UAS”), or drones, are being used by the Forest Service for forest health protection and wildfire monitoring. We note the additional capabilities drones have to accomplish various Forest Service missions, at lower cost and with a smaller carbon footprint, compared with legacy (pilot-on-board) aircraft. For instance, drones can be used as an early-warning system for a forest fire and can protect fire fighters by being able to provide an enhanced or additional perspective of hot spots, compromised structures, downed power lines, and other danger zones. Drones can be equipped with sensors to measure weather metrics in real time as well as to record the progress of a fire. Importantly, drones conduct these missions without putting a firefighter in harm’s way.

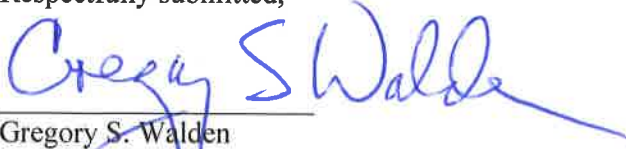
With respect to the request to comment on “(3) ways to enhance the quality, utility, and clarity of information to be collected,” none of the four forms included in this Notice, FS-5700-20, FS-5700-20a, FS-5700-21, and FS-5700-21a, was created with UAS in mind. Several questions on the forms do not apply in the case of drones, such as a question regarding the aircraft seat belt. The Coalition recommends that each of these forms be revised to address UAS and UAS pilots. Revising a federal form will not occur quickly; therefore, the Coalition urges the Forest Service in the interim to revise its website to elicit UAS operator interest in assisting the Forest Service’s missions, and to provide a prominent link to the Forest Service forms.

With respect to the request to comment on (4), the use of technological collection techniques to minimize the burden on respondents, the Coalition strongly supports automating these forms so that respondents can fill them out and submit them online.

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

SMALL UAV COALITION COMMENTS
Forest Service Pilot and Aircraft Record Forms
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Respectfully submitted,



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