

**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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December 29, 2020

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The Small UAV Coalition (“Coalition”)¹ is pleased to provide these comments in support of a new information collection proposed in the above-captioned Notice to conduct an online survey to gather current practices for UAS pilots. In particular, the target information relates to common fatigue-related practices and the minimum knowledge, skills, abilities, testing and staffing procedures required for operating UAS. The FAA intends to use the information collected to inform future rulemaking to address remote pilot certification for air carrier operations and flight and duty time periods applicable to remote pilot air carrier operations.

The Coalition recognizes the benefits of establishing minimum requirements, in terms of aeronautical knowledge and in-flight practical training and testing, for remote pilots conducting air carrier operations. The Coalition believes that some adjustments to the aeronautical knowledge subjects and testing area set forth in Part 107 may be in order for air carrier operations, while in-flight practical training and testing is not addressed in Part 107. The Coalition recommends that the FAA develop the minimum knowledge, skills and abilities requirements based on the experience of drone operators to date, and 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 for 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 that are 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

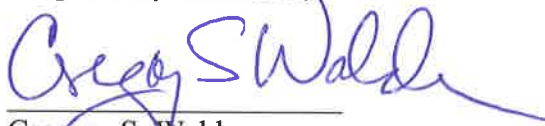
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According to the Notice, the FAA plans to survey “experts in industry and academia on UAS.” The FAA estimates 180 respondents. The Notice does not explain how the FAA arrived at this number. The Coalition believes the FAA should extend its survey to cover not only the handful of current UAS air carriers and those seeking a Part 135 or 137 permit, but also to include all Part 107 wavier holders, because they are likely to have relevant experience in conducting more complex operations, such as operations beyond the remote pilot’s visual line of sight.

With respect to academic experts, the Coalition recommends the FAA survey experts who have examined how fatigue may occur while a human operates a machine with increasing levels of autonomy as well as complexity in tasks. Some of these experts may not have any experience with UAS operations but nonetheless have insights that may inform future FAA rulemaking.

Respectfully submitted,



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