

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

IN THE MATTER OF

Petition of Harris Aerial, LLC for Exemption

Docket No. FAA-2022-1133

COMMENTS OF THE SMALL UAV COALITION

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September 4, 2022

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The Small UAV Coalition¹ is pleased to provide its comments in support of the petition by Harris Aerial, LLC (“Harris”) for an exemption under 49 U.S.C. 44807 to operate its HARRIS AERIAL CARRIER H6 HL drone, weighing no more than 209 lbs., to provide commercial operations and product demonstration. 87 Fed. Reg. 56484 (Sept. 14, 2022).

Drones offer a safe and efficient means of conducting a variety of operations. Members of the Small UAV Coalition share an interest in advancing regulatory and policy changes that will permit the operation of drones in the near term, within and beyond the line of sight, with varying degrees of autonomy, for commercial, other civil purposes, and for Department of Defense contractors. This includes operations of drones over 55 lbs.

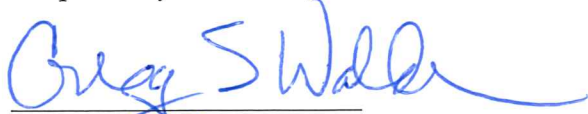
In its petition, Harris states that its drone will be operated “in predetermined airspace that is . . . [c]ontrolled as to access by mission support personnel only.” Harris notes that its drone has safety measures including geo-fencing and obstacle avoidance and redundant lost link responses. Operations will typically operate between 25 and 100 feet AGL within the visual line of sight of the remote pilot, with the assistance of a visual observer.

Harris’s pilots will hold a remote pilot certificate under Part 107, which FAA has previously approved for operations under section 44807, provided the remote pilot receives sufficient training in the specific drone model and nature of the drone operations. Harris will require pilots to undergo practical flight training and to demonstrate proficiency for the particular nature of its operations. The Coalition supports allowing pilots who are adequately trained in the drone model and the drone operations to conduct commercial operations, without holding a commercial Part 61 certificate.

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

In sum, the Coalition supports Harris's petition in full, given that its operations present no air risk in low-altitude closed-access sites, and that any ground risk will be adequately mitigated by the low-risk operational environment and other safety measures outlined in the petition.

Respectfully submitted,



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