

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

IN THE MATTER OF

Petition of Amazon Prime Air for Amendments to Exemption Nos. 18601 & 18602

Docket No. FAA-2019-0573

COMMENTS OF THE SMALL UAV COALITION

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The Small UAV Coalition (“Coalition”)¹ is pleased to provide its support of the petition by Amazon.com Services LLC d/b/a Amazon Prime Air (“Amazon”) for amendments to Exemption Nos. 18601 and 18602 to address Amazon’s second generation of drone model, the MK27-2. 87 Fed. Reg. 11804 (March 2, 2022).

Uncrewed aircraft systems (“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 (“BVLOS”), with varying degrees of autonomy, for commercial and other civil purposes. The Coalition also support progress in obtaining type and airworthiness certification for drone models, and notes that the FAA recently published special class airworthiness criteria for the MK27-2 drone. FAA Docket No. 2020-1086, 87 Fed. Reg. 4128 (Jan. 27, 2022). The Coalition believes that granting this petition will help advance these objectives.

The Coalition also notes that in section 348 of the FAA Reauthorization Act of 2018, Congress directed the FAA to update its regulations to authorize commercial package delivery operations. Exemptions, certifications, and other approvals will help inform this FAA rulemaking.

In addition to adding the MK27-2 to Exemption Nos. 18601 and 18602, Amazon seeks to modify several conditions and limitations to reflect the improvements in capabilities and the safety of the MK27-2.

Amazon notes improvements in the ability to (1) control the drone in the event it loses a propulsion unit and (2) detect when persons or obstacles are below the drone during delivery or landings to take the appropriate contingency response; and upgrades to improve the service reliability of the

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

drone. In consideration of these improvements, Amazon seeks to operate the drone without a Flight Termination System, to eliminate the Ground Station Observer, Aircraft Observer, and Backyard Safety Office positions, as these positions are either redundant or no longer necessary. The Coalition supports this request.

Amazon also seeks to remove the requirement of a 100-foot perimeter requirements from takeoff, landing, and delivery points, and the requirement for minimum standoff distances. The proposed revisions will allow transient but not sustained operations of non-participants and prohibit operations only in urban areas. The Coalition supports this request.

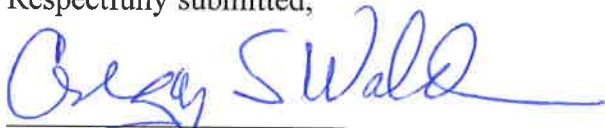
The Coalition likewise supports removal of a prescriptive minimum cruise altitude (180 ft. AGL), predetermined emergency landing areas, obstruction clearance requirements, and several additional prescriptive requirements in Exemption No. 18602 Condition and Limitation 16. Such prescriptive conditions should give way to performance requirements that will ensure the safety of cruise operations.

Amazon seeks also to remove the will not carry hazardous materials condition. The Coalition supports this request, as many hazmat items may be carried safely by a drone operator who complies with the hazmat regulations, noting that legacy aircraft are permitted to transport certain hazmat even on passenger aircraft, subject only to the requirements in the hazmat rules.

Finally, the Coalition supports revising the Conditions and Limitations that include pilot and medical certification requirements for drone pilots. The Coalition has long argued, and the FAA has regularly agreed, that Part 61 certification requirements are not necessary for drone pilots, where the drone pilots hold a remote pilot certificate with UAS rating and the pilot completes company- and drone-specific training and test flights, and in recognition that the drone will operate autonomously pursuant to pre-planned routes.

In sum, the Small UAV Coalition supports Amazon's petition for amendments to various Conditions and Limitations in Exemption Nos. 18601 and 18602, in consideration of the many safety features of the MK27-2 drone, the experience of thousands of safe flights in the MK27 model, and the other safety measures described in the petition. Accordingly, the Coalition requests the FAA grant Amazon's petition in full.

Respectfully submitted,



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