

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

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**IN THE MATTER OF**

**Petition of FulcrumAir Corp. for Exemption**

**Docket No. FAA-2022-0181**

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**COMMENTS OF THE SMALL UAV COALITION**

The Small UAV Coalition<sup>1</sup> is pleased to provide its comments in support of the petition by FulcrumAir Corp. (“FulcrumAir”) for an exemption under 49 U.S.C. 44807 to operate its E7500 electronic vertical takeoff and landing (“eVTOL”) drone, weighing no more than 220 lbs., to provide commercial external-load rotorcraft operations under a Part 133 rotorcraft external-load certificate for which FulcrumAir has applied. FAA Docket No. 2022-0181, 87 Fed. Reg. 48061 (Aug. 5, 2022) (docket number changed from FAA-2022-0121).

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 and other civil purposes. This includes operations of drones over 55 lbs., external-load operations under Part 133, and operations conducted by a company seeking type certification. The purpose of these operations is to support wildlife conservation by reducing the number of bird collisions into power lines, which is decidedly in the public interest.

In its petition, FulcrumAir states that its eVTOL drone is designed to sling an independently-powered machine on a tether used to install Bird Flight Diverters, and other cable sensing machines on overhead power transmission lines located in low-risk remote and sparsely-populated areas, in class G airspace below 400 feet above ground level (“AGL”) and within the visual line of sight of the remote pilot during only daylight hours. 87 Fed. Reg. at 48062. FulcrumAir has been conducting these operations in Canada for three years under a Special Flight Operations Certificate.

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<sup>1</sup> Members of the Small UAV Coalition are listed at [www.smalluavcoalition.org](http://www.smalluavcoalition.org).

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August 23, 2022

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While these operations might be considered higher risk if operated in densely populated environments, FulcrumAir's mission description states that all operations will be in remote and sparsely populated areas, along the power transmission line right of way. Further, takeoff and landing sites are coordinated with the utility provider and FulcrumAir will obtain permission of any landowner over which the operations will be conducted.

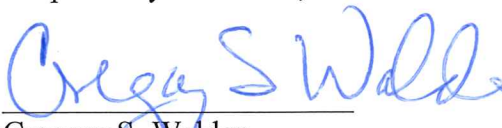
Regarding the drone's airworthiness for external-load operations, the Coalition supports FulcrumAir's use of the Specific Operations Risk Assessment ("SORA") model and the company's determination that its operations may be conducted safely under that analysis. The Coalition understands that FAA will be able to confirm the eVTOL aircraft's airworthiness as FulcrumAir is currently going through the type certification process.

FulcrumAir'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. FulcrumAir will require pilots to undergo practical flight training and to demonstrate proficiency for the particular nature of external-load operations. The Coalition supports allowing pilots who are adequately trained in the drone model and the drone operations to conduct commercial operations, including external-load operations, without holding a commercial Part 61 certificate or a Part 133 external-load rating.

The Coalition also supports an exemption from the 20-minute fuel reserve requirement, given the short duration and low-altitude nature of the drone operations and Fulcrum's commitment to maintain a 15% batter reserve for all operations.

In sum, the Coalition supports FulcrumAir's petition in full, given that its operations are clearly in the public interest, present no air risk in low-altitude visual line of sight operations, 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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