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

IN THE MATTER OF

Petition of University of California at Berkeley for Exemption

Docket No. FAA-2022-0501

COMMENTS OF THE SMALL UAV COALITION

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September 14, 2022

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The Small UAV Coalition[1] is pleased to support the petition by University of California at Berkeley ("Cal Berkeley" or "petitioner") for an exemption to operate the E500 drone weighing 630 pounds (with payload) to collect gravitational measurements in remote areas to measure variations in the earth's gravitational field. 87 Fed. Reg. 52425 (Aug. 25, 2022).[2]

Unmanned aircraft systems ("drones") offer a safe and efficient means of conducting a variety of operations, including the novel use proposed by Cal Berkeley. Members of the Small UAV Coalition share an interest in advancing regulatory and policy changes that will permit the operation of UAS 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 well over 55 lbs.

The petition states that it will operate the drone no higher than 200 feet AGL except that it may operate up to 400 feet under circumstances set forth in its operational manual. The petition also states that operations will be conducted in "rural and remote" areas with "controlled access." These operations will presumably be conducted during daylight hours within the visual line of sight of the remote pilot. The remote pilot will hold an airline transport pilot certificate and "was integral in the design and the development of the E500." The E500 will include geo-fencing among other safety features to keep the drone within the controlled access area, which will be at least 500 feet from non-participating persons.

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

[2] While petitioner refers to section 333, it also cites the successor statutory provision, 49 U.S.C. 44807, which is the authority to grant this petition.

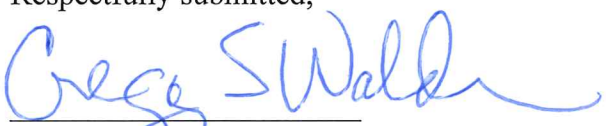
The petition does not explain how access the area of operations will be controlled, and therefor defers to the FAA's evaluation of this safety mitigation that may be explained in the manuals.

Assuming these VLOS flights are conducted within controlled access remote areas at these low altitudes, the Coalition believes any air or ground risk will be sufficiently mitigated. The issuance of a NOTAM may be appropriate to provide notice to low altitude legacy aviation operations in the vicinity.

With the typical flight duration of 25 minutes, the Coalition supports petitioner's proposals to ensure a 25% reserve of battery power as an equivalent level of safety to the 20-minute fuel reserve requirement in 14 C.F.R. 91.151(b).

For the reasons stated above and in Cal Berkeley's petition, the Coalition supports this petition in full. Accordingly, the Coalition requests the FAA grant Cal Berkeley's petition for exemption.

Respectfully submitted,



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