

July 10, 2023

The Honorable Sam Graves
Chairman
Committee on Transportation and Infrastructure
U.S. House of Representatives
Washington, DC 20515

The Honorable Rick Larsen
Ranking Member
Committee on Transportation and Infrastructure
U.S. House of Representatives
Washington, DC 20515

The Honorable Garret Graves
Chairman
Subcommittee on Aviation
Committee on Transportation and Infrastructure
U.S. House of Representatives
Washington, DC 20515

The Honorable Steve Cohen
Ranking Member
Subcommittee on Aviation
Committee on Transportation and Infrastructure
U.S. House of Representatives
Washington, DC 20515

Re: Industry Support of H.R. 3935, the Securing Growth and Robust Leadership in American Aviation Act

Dear Chairman Graves, Ranking Member Larsen, Chairman Graves, and Ranking Member Cohen:

The undersigned organizations have worked for years with federal government officials (Capitol Hill and the Executive Branch), industry stakeholders, academia, and others to promote solutions that enable the safe and secure integration of uncrewed aircraft systems (“UAS” or “drones”) and Advanced Air Mobility (“AAM”) aircraft, inclusive of electric vertical take-off and landing (“eVTOL”) aircraft, into our National Airspace System (“NAS”). In that spirit, we offer our strong support for the House Transportation and Infrastructure Committee’s amended and reported version of H.R. 3935, the Securing Growth and Robust Leadership in American Aviation Act (“Leadership in American Aviation Act”). We hope the full House considers and votes on the bill as soon as possible. The bill would reauthorize the Federal Aviation Administration (“FAA”) and aviation safety and infrastructure programs for the next five years, and would significantly move the needle for the UAS and AAM industries for years to come.

UAS and AAM technologies have quickly moved forward. The regulatory landscape, especially when it comes to UAS, has lagged behind, significantly risking U.S. global leadership in advanced aviation. This is problematic and has led the U.S. to continue to cede leadership in this space to other nations. The time is now for decisive congressional action to expand and enable commercial drones and AAM aircraft operations to scale for the benefit of all Americans. It is also imperative to hold the FAA accountable to meet critical deadlines they have laid out, including a beyond visual line of sight (“BVLOS”) rulemaking by early 2024 and a powered-lift special federal aviation regulation (“SFAR”) by December 2024.

To this end, we appreciate the forward-leaning approach outlined in the Leadership in American Aviation Act. In particular, we strongly support the congressional mandate and timeline for FAA’s issuance of a rulemaking enabling scaled UAS BVLOS operations. Broadly enabling UAS operations BVLOS in a safe and secure manner is critical to unlocking the safety, security, equity, sustainability, and economic benefits of using drones for many commercial and public safety use cases. This includes package delivery, critical infrastructure inspection, disaster relief and mitigation, firefighting, medical intervention, use by police departments and other public safety entities as part of Drone as First Responder (“DFR”) programs; and much more. We encourage as much alignment as possible with the Increasing Competitiveness for American Drones Act (“ICAD”), widely supported bipartisan legislation in the House and Senate, as the Leadership in American Aviation Act continues to advance.

We also strongly support other critical provisions in the bill, which would streamline UAS regulatory approvals; provide a path to implement UAS Traffic Management (“UTM”) services; establish acceptable levels of risk for drone operations; expand the important work of test sites and the BEYOND program; facilitate access to critical airspace data; solve issues related to operations over the high seas; fix systematic problems with National Environmental Policy Act (“NEPA”) processes; and more. We also are grateful to see the inclusion of provisions from the Drone Infrastructure Inspection Grant (“DIIG”) Act which would promote the use of drones for infrastructure applications to increase efficiency, reduce costs, and improve worker and community safety. All of the undersigned organizations have long supported the DIIG Act.

The legislation also takes significant steps to advance the AAM industry, including by defining powered-lift aircraft; requiring the integration of powered-lift aircraft into the NAS through future rulemakings inclusive of training requirements, requirements around the transfer of pilot certificates, and alignment with international recommendations/qualifications; supporting vertical flight by requiring updates to the Heliport Design Advisory Circular to include standards for use by eVTOL aircraft, and to include vertiports as a class of heliports; extending the AAM Infrastructure Pilot Program; establishing the Unmanned and Autonomous Flight Advisory Committee; and more. The legislation also includes a sensible provision to expand Airport Improvement Program (“AIP”) funding to help bring critical AAM infrastructure to airports, which will help allow electric aircraft to deploy. The legislation requires inclusion of the AAM industry on various committees and the Study on National Airspace Resources includes powered-lift operators to be consulted, a positive step. We also applaud the strong focus on aviation workforce development and noise related issues. The AAM industry is rapidly advancing and is bringing with that advancement impressive use cases and benefits, including advanced autonomy and the carriage of people and cargo, to both urban and rural America. It is critically important for the FAA to enable this emerging industry’s entry into service, and establish a clear and defined pathway to more full-scale AAM operations through additional advancements like autonomy, new flight rules, and air traffic modernization.

The Leadership in American Aviation Act is a critical step in ensuring U.S. leadership and competitiveness in the next era of advanced aviation, and in bringing the benefits of commercial drones and AAM to the American public. Thank you for your Leadership on the American Aviation Act.

We urge timely passage of the legislation, and we look forward to collectively serving as a resource to you.

Sincerely,

Association for Uncrewed Vehicle Systems International (AUVSI)
Commercial Drone Alliance (CDA)
Small UAV Coalition (SUAVC)

