

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

IN THE MATTER OF

Federal Aviation Administration's Review of the Civil Aviation Noise Policy

Docket No. FAA-2023-0855

COMMENTS OF THE SMALL UAV COALITION

**Gregory S. Walden
Dentons Global Advisors Government Relations LLC
1900 K Street NW
Washington, DC 20006
*Counsel to the Small UAV Coalition***

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The Small UAV Coalition¹ is pleased to provide this response to the FAA’s request for comments (“Request”) on its review of the Civil Aviation Noise Policy (“Noise Policy”). FAA-2023-0085, 88 Fed Reg. 26641 (May 1, 2023). The Coalition appreciates the FAA’s holding of four webinars open to the public, placing recordings of these webinars and other relevant materials on its webpage, and in holding additional briefings.

The Noise Policy should consider the positive environmental benefits of drones in comparison with legacy aircraft and surface modes of transportation

Current drone operations demonstrate that drones provide transportation solutions safely, efficiently, and with very little impact to the environment, including their effect on noise exposure. Using electric propulsion itself is a great environmental benefit for new operations, and especially in comparison to legacy modes of transportation. Further, drones carry much lower noise exposure levels than current modes of transportation and will generally produce reduced noise as well as lower emissions vis-à-vis other modes of transportation (i.e., cars and trucks) to carry goods, conduct inspections, monitoring, surveillance, search and rescue, etc. While small drone delivery operations will not likely replace legacy aircraft or ground transportation for large goods, they are expected to replace some surface transportation operations. Drone noise is a small fraction of the noise Americans are accustomed to in their everyday lives from a variety of different sources, especially in metropolitan areas, including from industrial settings, highway and transit system noise, and from operation of fixed wing aircraft, helicopters, and ground vehicles. The Noise Policy should take this fact into account when describing the noise impacts of drones, especially in metropolitan areas.

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

Proven metrics

DNL, the FAA's current standard noise metric, has worked well for decades, and has been applied to all aircraft types and models, as well as to all environments. The Coalition contends that DNL remains the best available noise metric and does not believe there is sufficient support in the literature to abandon DNL for a new alternative.

Measuring noise

Sophisticated, current noise measuring equipment is expensive to purchase without also considering the cost of hiring or training an expert to operate such equipment. For smaller companies, these costs are prohibitive and for larger companies the scheduling and overall personnel involvement is a resource drain. The Noise Policy should set performance criteria for noise measuring equipment, and not overly prescribe high fidelity equipment when a wide margin from existing noise standards may be demonstrated with readily available handheld-type equipment. There is a large (2 order of magnitude) difference in the availability, maintenance, calibration, technical skill, and cost between handheld devices and the equipment currently required to meet the FAA's current metrics under Part 36. Further the FAA should consider streamlining the measurement process used as part of an environmental assessment.

Threshold of significant noise exposure -- accounting for ambient noise

In considering the threshold of significant noise exposure from legacy aircraft, both fixed wing and rotorcraft, the noise from the aircraft is considered without taking account of ambient noise. This is not surprising because certain types of aircraft noise during takeoff, climb and landing likely dwarfs the noise from most other sources on the ground near airports. The perception of drone noise amid ambient noise from other sources is different. The noise from drone operations in a metropolitan area may not be heard in an environment in which louder noise from cars, trucks, vans is omnipresent, and in which noise from construction is frequent if irregular. In suburban and even rural environments, powered devices like regular highway and road traffic, delivery trucks, and everyday societal noise tends to drown out the minimal noise from drones flying overhead. Adding drones to this mix of existing ambient noise will not be significant.

The Coalition notes that the FAA has found in conducting environmental assessments of drone operations that it would take several hundred drone overflight operations over a specific area to reach the 65 DNL level of significant noise exposure. The Coalition believes that drone operations should be able to increase to scale without reaching this threshold of significance, affirming the reduced noise impacts in comparison with legacy aircraft and automobile operations.

Aircraft noise certification

While the FAA has completed just one type certificate for UAS aircraft type, a significant hurdle for more manufacturers to achieve TC for aircraft designs is the lack of a Part 36 Annex specific to drones. In fact, the FAA has yet to issue another type certificate for demonstration of aircraft

airworthiness. The FAA should establish a pathway for airworthiness certification, preferably by declarative certification to an objective standard as part of its regulatory approvals for drone operations to provide a pragmatic and predictable approach to aircraft design and operational approval. Revisions to the FAA's Civil Aviation Noise Policy should not delay the development of noise standards as part of the TC process.

Public participation in development of the Noise Policy

The Coalition reiterates its appreciation for webinars conducted by the FAA and the materials it has placed on its website. Should the FAA decide to revise its Noise Policy, the Coalition urges the FAA to publish a revised Noise Policy in draft and seek and evaluate public comment before issuing a revised Noise Policy.

Respectfully submitted,



Gregory S. Walden
Dentons Global Advisors Government Relations LLC
1900 K Street NW
Washington, DC 20006
gregory.walden@dentonsglobaladvisors.com
202-403-9904
Counsel to the Small UAV Coalition

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