

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

IN THE MATTER OF

Petition of Amazon Prime Air to Amend Exemption Nos. 18601B & 18602B

Docket No. FAA-2019-0573 and FAA-2019-0622

COMMENTS OF THE SMALL UAV COALITION

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The Small UAV Coalition¹ is pleased to provide its comments in strong support of the petition by Amazon.com Services LLC d/b/a Amazon Prime Air (“Prime Air”) to amend Exemption Nos. 18601B and 18602B to authorize Prime Air to conduct beyond visual line of sight (“BVLOS”) operations under its Part 135 certificate using its onboard detect and avoid (“DAA”) technology instead of visual observers. 88 Fed. Reg. 55812 (Aug. 16, 2023).

Drones offer a safe and efficient means of conducting a variety of operations. Members of the Small UAV Coalition, of which Prime Air is a member, share an interest in advancing regulatory and policy changes that will permit the operation of drones, within and beyond the line of sight, with varying degrees of autonomy, for commercial, other civil purposes. The Coalition welcomes this opportunity to support the use of onboard DAA in lieu of visual observers, as this development will help to unlock the tremendous potential benefits of package delivery.

Amazon’s proprietary technology is designed to deconflict both ADS-B equipped (cooperative, or electronically conspicuous) and non-cooperative aircraft that are not equipped to be electronically conspicuous, such as hot air balloons, ultralights, and powered parachutes. Prime Air’s DAA system is comprised of a mid-air collision avoidance function to detect and avoid airborne obstacles in the flight path and a forward collision alert function to detect and avoid objects on the ground. Use of visual observers as the means of providing DAA capability for BVLOS operations is not practical over long-range routes. DAA technology, not visual observers, is what the drone industry needs safely and efficiently to operate drones BVLOS at scale in a variety of operational environments.

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

The FAA agrees with the capability of onboard DAA systems to perform alert and deconfliction functions, as amply noted in Prime Air's petition. Granting this petition is unquestionably in the public interest.

Moreover, as stated in the petition, Prime Air's DAA system will exceed the level of safety provided by the see-and-avoid requirement in 14 C.F.R. 91.113 because it "enables real-time avoidance maneuvers when it detects potential conflict, generating a timely alert and enacting an effective avoidance maneuver direction (climb or decent) along the pre-planned route[.]" The Coalition agrees that onboard DAA technology is safer than using visual observers or even radar.

The FAA is well aware of Prime Air's stellar safety record in operating its MK27-2 drone in various locations in the United States. The Coalition encourages the FAA to authorize BVLOS operations using Prime Air's onboard DAA technology as the FAA confirms the safety and reliability of its DAA technology through evaluating the October 2022 submission of the results of simulation, testing, and analysis of DAA/BVLOS operations conducted as part of Prime Air's type certification process.

Prime Air petitions to amend Conditions and Limitations in its Exemptions relating to the use of visual observers by adding language such as "when required by the Administrator" and "if VOs are required for the operation." To comply with the requirement to remain clear and give way to manned aircraft, Prime Air proposes this sentence: "The operator may use the UA's onboard DAA system, as authorized by the Administrator, to comply with this requirement." The Coalition agrees that these amendments will allow the FAA and Prime Air to work together to authorize Prime Air's DAA technology where Prime Air now operates and expand its use to other locations as may be authorized by rule or exemption.

In sum, the Coalition supports granting Prime Air's petition in full.

Respectfully submitted,



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