

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

IN THE MATTER OF

Petition of Causey Aviation Unmanned, Inc. for Exemption

Docket No. FAA-2020-0564

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***

October 23, 2023

Filed with www.regulations.gov

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The Small UAV Coalition¹ is pleased to provide its comments in support of the petition by Causey Aviation Unmanned, Inc. (“CAU”) for an exemption from 14 C.F.R. 43.3(a) to enable its remote pilots, in place a certified aircraft mechanic, to replace the batteries on its Flytrex FTX-M600P drones used in Part 135 operations. 88 Fed. Reg. 67862 (Oct. 2, 2023).

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. The Coalition also supports common sense exemptions, such as the requested exemption, from FAA regulations clearly intended for legacy aircraft.


There is no question that allowing remote pilots to replace batteries is more efficient and less costly than using a certified aircraft mechanic. As CAU states in its petition, there is no safety risk in replacing batteries by pilots. The batteries are “plug-and-play, require no tools or equipment, and do not affect any other systems.” If any battery is not installed properly, the drone will not operate.

CAU pilots have replaced over 100,000 batteries without incident in operations under Part 107. Even so, CAU pilots will complete battery replacement training.

Accordingly, the Coalition supports granting the requested exemption.

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

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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