

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

IN THE MATTER OF

Petition of Hylio, Inc. for Exemption

Docket No. FAA-2023-1833

COMMENTS OF THE SMALL UAV COALITION

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November 2, 2023

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The Small UAV Coalition¹ is pleased to provide its comments in support of the petition by Hylio, Inc. (“Hylio”) for an exemption from several rules in Parts 61, 91, and 137 to operate up to three Hylio AG-230 drones simultaneously, each weighing around 165 lbs., by a single pilot, during night within the visual line of sight (“VLOS”) of the remote pilot, and closer than 500 feet from structures, for commercial agriculture-related services, and for its pilots to hold a remote pilot certificate in lieu of a Part 61 pilot certificate. 88 Fed. Reg. 71072 (Oct. 13, 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, other civil purposes, and that interest is served by granting petitions for exemption such as Hylio’s petition.

At the outset, the Coalition notes Hylio will operate its drones very close to the ground, 10 to no more than 30 feet AGL, over predetermined, uninhabited, private, or controlled-access property. With a geo-fence boundary, and operations within the visual lone of sight of the pilot, there is little to no air risk or ground risk requiring any additional mitigation. That said, the AG-230 model contains several safety systems, include redundant GPS, return-to-launch, and rotor fail protection, providing additional layers of safety.

Pilots for Hylio will hold a remote pilot certificate under Part 107, which FAA has previously approved for operations under section 44807, provided the remote pilot receives sufficient training in the specific drone model and the nature of the drone operations. Hylio will require pilots to undergo practical flight training and to demonstrate proficiency for the particular operating

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

environment of agricultural spraying under Part 137. The Coalition supports allowing pilots who are adequately trained in the drone model and the drone operations to conduct commercial operations, without holding a commercial Part 61 certificate.

In sum, the Coalition supports Hylio's petition for exemption in full.

Respectfully submitted,



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