

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

IN THE MATTER OF

Petition of L3Harris Technologies for Exemption

Docket No. FAA-2022-1193

COMMENTS OF THE SMALL UAV COALITION

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The Small UAV Coalition¹ (the “Coalition”) is pleased to provide its comments in support of the petition for exemption under 49 U.S.C. 44807 filed by L3Harris Technologies (“L3Harris”) to operate its FVR-55 drone weighing up to 70 pounds for platform development, training, and aerial data acquisition. 88 Fed. Reg. 2153 (Jan. 11, 2023). L3Harris has operated this mode of drone under Part 107 without incident. An exemption under section 44807 is required because this drone model with payload will weigh more than 55 lbs.

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. This includes operations of drones over 55 lbs.

The FV-55 is an electric vertical takeoff and landing (“EVTOL”) drone with forward flight propelled by gasoline. L3 Harris intends to operate the FVR-55 during daylight hours, within the visual line of sight of a remote pilot, with the aid of a visual observer, under 400 feet Above Ground Level (“AGL”). It is capable of up to ten hours of flight with ten pounds of payload. The drone will not be flown within 500 feet of a structure or person unless shielded.

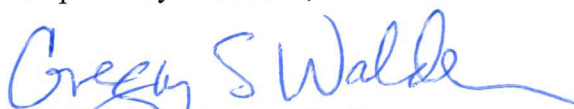
L3Harris states that it is seeking type certification for the FVR-55 drone. Exemptions under parts 61 and 91 are warranted as flights will be no different from the flights under part 107 except for the greater weight of the drone. The air risk and ground risk are adequately addressed by observing the limitations in Part 107, including the use of a visual observer.

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

L3Harris's pilots 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 nature of the drone operations. L3Harris will require pilots to undergo practical flight training and to demonstrate proficiency for the particular nature of its operations. 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 L3Harris's petition in full, given that its operations present no air risk or ground risk not adequately addressed by the operational limitations and other safety measures outlined in the petition

Respectfully submitted,



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