

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

IN THE MATTER OF

**Petition of UPS Flight Forward, Inc. for amendment to Exemption Nos. 18338D and
18339C**

Docket No. FAA-2019-0628

COMMENTS OF THE SMALL UAV COALITION

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June 14, 2023

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The Small UAV Coalition¹ is pleased to provide its comments in support of the petition by UPS Flight Forward, Inc. (“UPS”) for an exemption under 14 C.F.R. 61.23(a)(2), 91.113, 91.119, 135.24(3)(b)(1), and 135.205(A) to allow UPS to:

- (1) incorporate a remote operations center (“ROC”) allowing a remote pilot to operate flights in outlying locations from a ROC in a different location; and
- (2) use its Matternet M2 drone and a ground-based surveillance system (“GBSS”) coupled with a suite of situational awareness tools that would replace the use of visual observers for beyond visual line of sight (“BVLOS”) operations.

88 Fed. Reg. 33959 (May 25, 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. The Coalition recognizes that the Matternet M2 drone is the only drone that has been issued a type certificate. The Coalition welcomes this opportunity to support the use of ground-based surveillance of aircraft in the vicinity in lieu of visual observers.

The great promise of detection technology is that it can obviate the use of visual observers. Using visual observers as the means of providing situational awareness 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

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

environments. The Coalition believes that UPS's petition outlines safety redundancies that will ensure the safety, security, and reliability of communications between the remote pilot and the drone. Technology exists to allow for long-distance command and communication, and the FAA should move smartly to authorize the use of a control station that is not co-located with the drones.

As UPS is a Part 135 air carrier, operating a type-certificated drone, with a Safety Risk management program, the Coalition is confident that the statements made in the UPS petition demonstrate that granting this petition is in the public interest and will not result in any degradation of safety.

Respectfully submitted,



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