

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

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**IN THE MATTER OF**

**Petition of Unconventional Concepts, Inc. for Exemption**

**Docket No. FAA-2022-0502**

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**COMMENTS OF THE SMALL UAV COALITION**

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February 14, 2023

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The Small UAV Coalition<sup>1</sup> is pleased to provide its comments in support of the petition by Unconventional Concepts, Inc. (“UCI”) for an exemption under 49 U.S.C. 44807 to operate the DGI Agras T20 drone, weighing (with payload) no more than 150 lbs., to conduct research and development using a drone designed for agricultural purposes to support and inform law enforcement and “the national security objective.” 88 Fed. Reg. 5956 (Jan. 30, 2023). UCI will experiment with various instrumentation payloads, including medical supplies and batteries.

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 interest includes authorizing operations of drones over 55 lbs. through exemptions.

In its petition, UCI states that it will operate only in Class G airspace, during daylight hours, within the visual line of sight of the remote pilot with the aid of a visual observer. UCI will restrict access to the testing sites, and thus will not fly over people. This restricted access should address any ground risk and VLOS flights below 400 feet Above Ground Level (“AGL”) with the aid of a visual observer should address any air risk.

UCI’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. UCI will require pilots to undergo practical flight training and to demonstrate proficiency tailored for the proposed operations. The

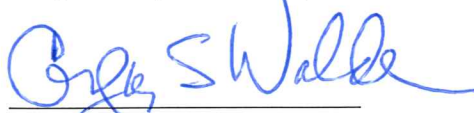
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<sup>1</sup> Members of the Small UAV Coalition are listed at [www.smalluavcoalition.org](http://www.smalluavcoalition.org).

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 UCI's petition in full, given that its operations present no material air risk in low-altitude restricted access sites and any ground risk will be adequately mitigated by the low-risk operational environment (which will not include any non-involved individuals), and in consideration of other safety features of the DJI Agras T20 and additional safety measures outlined in the petition.

Respectfully submitted,



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