

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

IN THE MATTER OF

Petition of Zipline International Inc. for Amendment of Exemption No. 19111B

Docket No. FAA-2020-0499

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 strong support of the petition by Zipline International Inc. (“Zipline”) for an amendment to Exemption No. 19111B to authorize Zipline to conduct beyond visual line of sight (“BVLOS”) operations using its onboard detect and avoid (“DAA”) technology instead of visual observers. 88 Fed. Reg. 33958 (May 25, 2023).

Drones offer a safe and efficient means of conducting a variety of operations. Members of the Small UAV Coalition, of which Zipline is a member, 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 welcomes this opportunity to support the use of onboard DAA in lieu of visual observers.

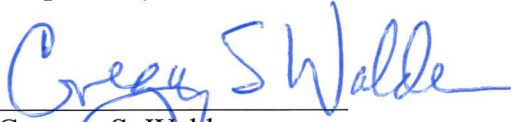
The great promise of Zipline’s proprietary technology is that it is expected to deconflict both ADS-B equipped (cooperative, or electronically conspicuous) and non-cooperative aircraft that are not equipped to be electronically conspicuous. Use of visual observers as the means of providing DAA capability 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 environments.

The FAA is well aware of Zipline’s stellar safety record in operating under Part 107, Part 91, and Part 135, as well as Zipline’s extensive experience with long-range BVLOS operations outside of the United States. The Coalition encourages the FAA to authorize BVLOS operations using its onboard DAA technology as the FAA confirms the safety and reliability of Ziplines operations through the phased approach in the FAA-accepted Collision Avoidance Issue Paper as described in this petition.

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

Zipline petitions to amend Conditions and Limitations relating to the use of visual observers by adding to the requirement to use visual observers the proviso: “Unless otherwise authorized by a Certificate of Waiver or Authorization.” The Coalition agrees that this amendment will allow the FAA and Zipline to work together to expand use of Zipline’s DAA technology as the FAA deems appropriate, obviating further revisions to Exemption No. 19111B.

Respectfully submitted,



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