

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

IN THE MATTER OF

**Request for Comments; Clearance of a New Approval of Information Collection:
Unmanned Aircraft System (UAS) Integration at Airports and Necessary
Planning, Design, and Physical Infrastructure Needs**

Docket No. FAA-2024-0189

COMMENTS OF THE SMALL UAV COALITION

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April 2, 2024

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The Small UAV Coalition¹ (“Coalition”) provides the following comments on the Federal Aviation Administration’s proposal to collect information through interviews of aviation stakeholders to catalog current and planned “droneport” planning, design, and infrastructure needs, as well as to find out which airports are integrating unmanned aircraft systems (“UAS” or “drones”) into the airport environment. 89 Fed. Reg. 7435 (Feb. 2, 2024).

The FAA intends to interview about 100 stakeholders. 89 Fed. Reg. at 7436. Considering the many categories of aviation stakeholders, the Coalition recommends that the FAA send the survey to all drone organizations, which in turn will disseminate the survey to its members, rather than the FAA select only a handful of survey recipients among “original equipment manufacturers, private entities, and UA industry vendors.”

The Coalition is concerned with the term “droneport” in the notice, as this term is not defined in the Federal Aviation Regulations, FAA orders or advisory circulars (a fact the FAA acknowledges) or is even part of the common vernacular. This is not surprising, because the typical surface area drone operators use for takeoffs and landings is smaller by many orders of magnitude than the smallest general aviation *airport* and is also quite smaller than the smallest *heliport* in operation or *vertiport* in design. The area a drone operator uses for takeoff and landing, as well as delivery services, is not a “port” in the traditional sense. The FAA’s use of this new term implies that drones use or will need to use ports when the term “takeoff and landing” area or site is more accurate.

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

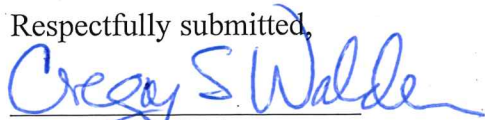
The FAA offers to use the “airport” definition in 14 C.F.R. part 1 to define “droneport”: “an area of land or water that is used or intended to be used for the landing and takeoff of UAS aircraft, and includes its buildings and facilities, if any.” This definition suggests that drone operators use discrete and fixed areas of land or water, buildings and/or facilities, which may be the case for some operators and not others, and in some instances and not in others. Unlike commercial service and general aviation airports in the United States, takeoff and landing areas of commercial drones are not likely to be owned and operated by a state, county, city or other governmental entity. The Coalition expects drone operators (other than those in the transport category) will be able to satisfy any physical infrastructure need without having to use or build an airport, much less obtain federal funding to defray costs.

The FAA is also interested in which airports may be integrating drones into the airport environment. Given the nature of this information collection notice, this interest should be focused on accommodating takeoff and landing of drones, rather than drones operating in the airspace above an airport or the use of drones by an airport (e.g., for perimeter security). As stated above, the Coalition expects the drone industry is not looking to use legacy airport airfield or terminal property (or heliports) for takeoffs and landings.

The notice states that the survey “will primarily focus on UAS aircraft weighing 55 pounds or more and include operational considerations for cargo transport. Vehicles with weights lower than 55 pounds will be considered where applicable.” 89 Fed. Reg. at 7436. The Coalition recognizes that cargo transport drone operations, whether fixed-wing or rotary, may opt to use existing airports and heliports. However, the Coalition does not believe that a drone weighing more than 55 pounds is any more in need of the physical infrastructure of an airport or heliport than a drone weighing less. Whatever the basis may be for the FAA’s definition of “small” drone in Part 107, that distinction has little relevance to the question of airport or infrastructure needs. Applicants seeking an exemption under 49 U.S.C. section 44807 – because the drone weighs more than 55 lbs. – typically propose to operate a drone weighing from a few pounds over the Part 107 limit to several hundred pounds in the case of agricultural spraying operations, a far cry in either case from cargo transport category operations.

The FAA is conducting this survey to inform its establishment of “infrastructure design requirements and safety standards for existing and standalone facilities referred to as a droneport.” 89 Fed. Reg. at 7436. The Coalition urges the FAA, based on the information it obtains from this survey, not to adopt design or safety standards unless necessary to do so. Current drone operators, using drones weighing under as well as over 55 lbs. have developed a wide variety of takeoff and landing sites, of varying size and complexity, which the FAA may consider “standalone facilities.” The Coalition suggests that existing (as well as future) performance standards should suffice to ensure the safety of takeoffs and landings rather than adopting prescriptive design or safety standards.

Respectfully submitted,



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