

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

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**IN THE MATTER OF**

**Petition of Watts Innovations, Inc. for Exemption**

**Docket No. FAA-2023-2072**

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**COMMENTS OF THE SMALL UAV COALITION**

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March 13, 2024

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The Small UAV Coalition<sup>1</sup> is pleased to provide comments in support of the petition filed by Watts Innovations, Inc. (“Watts”) for an exemption under 49 U.S.C. 44807 to operate its PRISM Sky and PRISM Lite drones for testing and demonstration purposes of Standard and SuperLift configuration with a maximum takeoff weight not to exceed 150 lbs. 89 Fed. Reg. 14733 (Feb. 28, 2024).

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 within and beyond the line of sight, with varying degrees of autonomy, weighing under or over 55 lbs., for commercial and other civil purposes, and that interest is served by granting petitions for exemption such as Watts Innovations’ petition.

Watts’s drone operations will be conducted within the visual line of sight of the remote pilot in class G airspace in low-risk environments away from densely populated areas. Watts seeks exemptions from several provisions of Parts 61 and 91 to operate essentially in alignment with Part 107 requirements.

Watts proposes to use remote pilots holding a Part 107 remote pilot certificate. The FAA has routinely granted exemptions from Part 61 commercial pilot requirements in recognition of a pilot’s Part 107 certificate and additional training tailored to the specific drone model, which Watts will provide. The Coalition supports this exemption request as well as the request for relief from the medical certificate requirements, as these should not be required for remote pilots.

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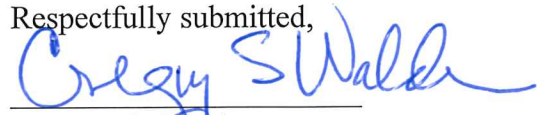
<sup>1</sup> Members of the Small UAV Coalition are listed at [www.smalluavcoalition.org](http://www.smalluavcoalition.org).

Watts Pre-Flight Safety Brief will ensure that its drone operations do not conflict with any manned aircraft operating in the vicinity.

With respect to the airworthiness of the drone models, we trust the FAA to determine the airworthiness of these drones by a review of the manuals submitted confidentially to the FAA, including Watt's Safety Risk Analysis. The features of its drone models for power, control, communication, and emergency response, such as geo-fencing and autopilot software, all contribute to mitigation of both air and ground risk.

In sum, the Coalition supports the petition of Watts Innovations in consideration of the safety features of its drone models, including measures to mitigate air and ground risks, and the lower-risk environment of VLOS operations in Class G airspace.

Respectfully submitted,



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