

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

IN THE MATTER OF

Petition of American Drone LLC for amendment of Exemption No. 19560

Docket No. FAA-2022-0319

COMMENTS OF THE SMALL UAV COALITION

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April 1, 2024

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The Small UAV Coalition¹ is pleased to provide comments in support of the petition filed by American Drone LLC (“American Drone”) for an amendment to Exemption No. 19560 to operate DJI Agras drones BVLOS when conducting agricultural spraying under Part 137 in fields that are surrounded by varying topology or boundaries that obscure a view of the field. 89 Fed. Reg. 17536 (Mar. 11, 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 the relief sought by American Drone in this petition.

American Drone typically operates its drones no more than 20 feet above the crop canopy where all airspace is visible. The petitioner is seeking to operate BVLOS when “direct line of sight is not practical to obtain.” The margin of safety can be maintained when the operation is briefly BVLOS because all airspace above and beyond the defined field, as well as the flight paths from takeoff/landing areas to the point above the field in which the drone will operate BVLOS, will be visible to both the remote pilot and any visual observer. The only BVLOS moments are when the drone is below terrain or tree line, which removes any risk of collision with a manned aircraft.

In such low population density and low altitude, the ground and air risks should be negligible. Even so, operations will be suspended if a non-participant strays into the operations area. Given these low risks, the Coalition believes these limited BVLOS operations can be conducted safely

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

without detect and avoid technology, although American Drone states that the Agras drones are equipped with ADS-B In awareness.

In sum, the Coalition supports the petition of American Drone in consideration of the safety features of the Agras drones, including measures to mitigate air and ground risks, and the lower-risk environment of below tree line agricultural spraying operations in Class G airspace.

Respectfully submitted,



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