

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

IN THE MATTER OF

**Request for Comments; Clearance of a Renewed Approval of Information Collection:
Operation of Small Unmanned Aircraft Systems Over People**

Docket No. FAA-2024-1064

COMMENTS OF THE SMALL UAV COALITION

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June 3, 2024

Filed with www.regulations.gov

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The Small UAV Coalition¹ (“Coalition”) provides the following comments on the Federal Aviation Administration’s proposal to renew the collection of information from drone operators that conduct operations over people under category 4, which per 14 C.F.R. 107.40 requires the drone hold a Part 21 airworthiness certificate. Clearance of a Renewed Approval of Information Collection: Operation of Small Unmanned Aircraft Systems Over People, 89 Fed. Reg. 22764 (April 2, 2024). Subsection 107.40(c) requires the operator to maintain [read: provide information on] maintenance records, the status of life-limited parts, compliance with airworthiness directives, and inspection status.

The FAA estimates only two drone companies will operate drones with an airworthiness certificate per year, and estimates that each operator will have a fleet of 100 drones (each holding a Part 21 airworthiness certificate). Further, the FAA estimates that it will take an operator only 30 minutes per aircraft per year to maintain these records.

The Coalition believes the estimate of 30 minutes per year may be significantly understated, based on the need to conduct regular maintenance, even if there is no airworthiness directive on drones and few life-limited parts. A more realistic estimate would be one to two hours per drone per year.

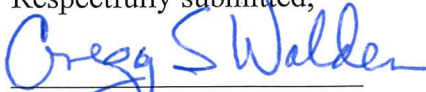
The notice is ambiguous whether the FAA expects two new fleet operators each year, or only two in 2024 and the same two in 2025.

While not within the scope of this information collection notice, the Coalition notes that the recent enactment of H.R. 3935, the Strengthening Aviation Safety and Robust Leadership Act, includes in section 930, new section 44811, which directs the FAA to include in its rule authorizing drone

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

operations beyond the visual line of sight (BVLOS), an approval process that does not require type or production certification and that contemplates either a special airworthiness certificate or a manufacturer's declaration of compliance. The Coalition recommends the FAA consider revising section 107.40 to permit Stage 4 operations over people, authorized to fly BVLOS, per special airworthiness certification or a manufacturer's declaration of compliance.

Respectfully submitted,



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