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

IN THE MATTER OF

Petition of 417 Drone Imaging LLC for Exemption

Docket No. FAA-2023-0471

COMMENTS OF THE SMALL UAV COALITION

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July 13, 2023

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The Small UAV Coalition[1] is pleased to provide its comments in support of the petition by 417 Drone Imaging LLC ("417") for an exemption from 14 C.F.R. 48.110(a)(6) and (7)61.23(a)(2) to obtain and pay for one registration number that will cover all drones used in a swarm of drones used in light shows. 88 Fed. Reg. 41185 (June 23, 2023).

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 in the near term, within and beyond the line of sight, with varying degrees of autonomy, for commercial, other civil purposes. The Coalition supports the use of drones in light shows as a safe, environmentally beneficial, and exciting alternative to traditional fireworks performances.

417 makes the case that each of its very small drones operates as part of a swarm – a single unit operated by a single pilot in command. The drones are used only in light show performances, so that the FAA will be able to track one drone as easily as all other drones in the swarm. 417 has offered to maintain a list of all of its drones by serial number, which could be submitted to the FAA at the time of registration and available to the FAA upon request, but 417 seeks an exemption so it can obtain a single registration number and avoid the financial cost as well as the burdens involved in submitting hundreds of registrations and renewals.

The Coalition agrees that the public interest supports the facilitation of drone light shows and perceives no safety or security concern with using one registration number for all of the drones in the swarm. Accordingly, the Coalition supports granting the requested exemption.

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

Respectfully submitted,

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