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

IN THE MATTER OF

Petition of Northeast Unmanned Aviation Research Alliance for Exemption

Docket No. FAA-2025-0414

COMMENTS OF THE SMALL UAV COALITION

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June 12, 2025

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The Small UAV Coalition[1] ("Coalition") provides the following comments in support of the petition for exemption filed by Northeast Unmanned Aviation Research Alliance ("NUAIR") to operate fixed-wing and rotorcraft drones weighing up to 1,320 pounds, beyond visual line o0f sight ("BVLOS") within a defined 450-square mile area of Central New York, where NUAIR intends to use a network of ground-based radars and ADS-B In terminals to detect and avoid aircraft during BVLOS flights. 90 Fed. Reg 22146 (May 23, 2025).

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, as well as for novel uses that bring safety or economic benefits to the public. The Coalition also supports testing and deployment of electronic conspicuity technology to ensure safe separation of aircraft in the same airspace, such as what NUAIR seeks to perform.

The Coalition has long supported, and the FAA has often approved by exemption, the operation of drones over 55 lbs. Here, although the drones will weigh up to 1,320 lbs., they will be flown in a controlled area, thereby addressing both air and ground risks. NUAIR has an unblemished safety record in operating small drones BVLOS in the same airspace.

NUAIR seeks to operate its aircraft up to 10,000 feet MSL in various airspace including Class C. NUAIR has a partnership Syracuse International Airport ("KSYR") that will ensure the safety of operations under the requested exemption and to and from KSYR.

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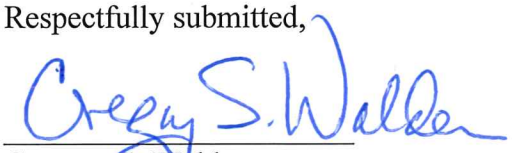
[1] Members of the Small UAV Coalition are listed at www.smalluavcoalition.org.

With respect to the airworthiness of particular aircraft models, NUAIR refers the FAA to its ConOps document, and the Coalition defers to the FAA in evaluating NUAIR's request in this regard.

As for other Part 91 regulations from which NUAIR seeks an exemption, the Coalition has regularly supported such exemption requests on the basis that these regulations do not neatly fit or logically apply to drone operations and the petitioner's showing that operations may be conducted safely without complying with such requirements.

In sum, the Coalition supports NUAIR's petition for exemption, in consideration of its stellar safety record, the controlled operational environment, and the benefits from employing electronic conspicuity technology to detect and avoid aircraft operating BVLOS.

Respectfully submitted,



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