



**SMALL UAV
COALITION**
*A Partnership for
Safety & Innovation*

July 23, 2015

The Honorable John Thune
Chairman
Committee on Commerce, Science,
and Transportation
512 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Bill Nelson
Ranking Member
Committee on Commerce, Science,
and Transportation
425 Hart Senate Office Building
Washington, DC 20510

The Honorable Kelly Ayotte
Chairman
Subcommittee on Aviation Operations,
Safety and Security
227 Hart Senate Office Building
Washington, DC 20510

The Honorable Maria Cantwell
Ranking Member
Subcommittee on Aviation Operations,
Safety and Security
427 Hart Senate Office Building
Washington, DC 20510

Dear Chairmen Thune and Ayotte, and Ranking Members Nelson and Cantwell:

Members of the Small UAV Coalition¹ share an interest in advancing legislative, regulatory and policy changes that will permit the safe operation of small UAVs in the near term, within and beyond the line of sight, with varying degrees of autonomy, for commercial, consumer, recreational and philanthropic purposes. The upcoming reauthorization of the Federal Aviation Administration provides Congress with an opportunity to expedite the growth of the small unmanned aerial systems (sUAS) industry, which is poised to benefit nearly all sectors of the US economy. We have previously shared with your staff a detailed set of legislative provisions intended for the Committee's consideration as part of an FAA reauthorization bill and we take this opportunity to highlight one of those provisions for your consideration, the authorization of commercial operations of "micro" UAVs, those weighing less than 4.4 pounds.

We urge Congress to include a provision in its reauthorization legislation that exempts micro UAVs from certain operational requirements in order to allow the United States to safely enjoy the benefits of this technology, a benefit already being afforded micro UAVs in countries like Australia, Canada, and France because of their lower risk. In its [proposed rule for sUAS](#) (released on February 15 of this year), the FAA announced that it is considering an option to exempt sUAVs under 4.4 lbs. operating no faster than 30 knots from requirements related to area

¹ Members of the Small UAV Coalition include 3D Robotics, Aerialtronics, AirMap, Airware, AGI, Amazon Prime Air, Botlink, DJI Innovations, Drone Deploy, EHang, Flirtey, Google[x] Project Wing, GoPro, HAZON Solutions, Intel, InterMedia Development Corporation, Kespry, Parrot, PrecisionHawk, Sky-Futures, SkyWard IO, SkyPan, Strat-Aero, Verifly, Verizon, and Zero Tech.

of operations, operator knowledge test requirements, and operations over people. This concept is borrowed from Canada's current regulatory system for micro-UAS. We applaud the FAA for recognizing that micro UAVs have a much lower risk profile than larger drones. Moreover, while we believe that sUAS larger than 4.4 lbs may be operated with the same level of safety, we respect the FAA's incremental approach and welcome the opportunity to demonstrate safety through the direct experience of commercial operation across the United States under section 333 exemption authority, under the auspices of a test site, and under the final rule when adopted.

Micro UAVs, although small, will have a dramatic impact on the US economy. The 1.5 pound senseFly eBee, for example, is in wide use across the world for purposes related to agriculture, mining, surveying, humanitarian aid, GIS, and environmental protection. The FAA has given permission to nearly 30 different commercial operators to operate the eBee in the United States, albeit under a more stringent set of conditions and limitations than what the FAA contemplated in its micro UAS option. Yet hundreds of applications for use of the eBee and other micro UAVs through the Section 333 process remain pending at the FAA, hindering the commercial operation and attendant benefits of greater micro UAV deployment.

Like other salutary provisions in the FAA's proposed rule – such as eliminating the requirement that a UAV operator must have manned aircraft flying experience – the industry and public will not see the manifold benefits of small UAVs until the FAA publishes a final rule, not expected before summer of 2016, unless Congress acts this year in the FAA reauthorization bill.

For these reasons, we respectfully request that you include a provision in the FAA reauthorization act that authorizes the operation of micro UAVs in advance of the FAA's promulgation of a final sUAS rule.

We appreciate the opportunity to work with the Committee to help advance the small UAS industry.

Best,



Michael Drobac
Executive Director
Small UAV Coalition



Greg S. Walden
Chief Aviation Counsel
Small UAV Coalition

