

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

IN THE MATTER OF

Petition of Wes Myers for Amendment of Exemption No. 11592

Docket Number: FAA-2015-0443

COMMENTS OF THE SMALL UAV COALITION

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Introduction

The Small UAV Coalition¹ is pleased to provide its comments in support of the petition by Wes Myers (“Myers”) for an amendment to Exemption No. 11592 to permit Myers to operate his small unmanned aircraft system (“sUAS”) without having to comply with the biennial flight review requirements in 14 C.F.R. §61.56, and thus seeks relief from standard condition 13.

Members of the Small UAV Coalition share an interest in advancing regulatory and policy changes that will permit the 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. We applaud the Federal Aviation Administration (“FAA”) for accelerating the pace of exemptions. The Coalition believes there are additional steps the FAA can take to broaden the authority to conduct commercial operations. In particular, the FAA has the authority and the discretion to grant the modest relief requested by Myers and revise the standard condition requiring the operator to hold an airman certificate and comply with Part 61.

The Coalition supports Myers’ request to comply with the ground portion of the flight review requirement but be exempt from the manned aircraft flight training requirement. Myers holds a commercial pilot certificate, and thus seeks an exemption only from the flight training requirement in section 61.56.

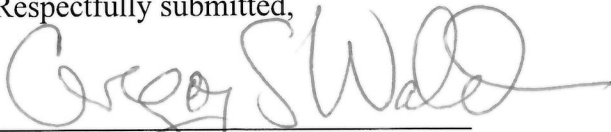
The Coalition, in its comments to the FAA’s sUAS proposed rule, urged the FAA to adopt small UAS operator qualifications that match the skills necessary to operate the particular UAV as well as the basic knowledge gained in FAA ground school training. The FAA is proposing to require

¹ Members of the Small UAV Coalition include 3D Robotics, AirMap, AGI, Amazon Prime Air, Botlink, DJI Innovations, Drone Deploy, Flirtey, Google[x] Project Wing, GoPro, Intel, Kespry, Parrot, PrecisionHawk, Strat-Aero, Verizon Ventures, and Zero Tech.

a small UAS operator to pass an aeronautical knowledge test, and not require the holding of a commercial, private, recreational, or sport pilot certificate. 80 Fed. Reg. at 9588 (proposed Part 107, Subpart C). Myers' request, therefore, is consistent with the FAA's proposed rule. As the Coalition has stated in its comments on the sUAS proposed rule and in comments in section 333 proceedings, the FAA has the statutory exemption authority and discretion to exempt a UAS operator from the airman certification requirements in Part 61.

Accordingly, the Coalition supports Myer's petition for amendment.

Respectfully submitted,

A handwritten signature in black ink that reads "Gregory S. Walden". The signature is written in a cursive style with a long horizontal stroke at the end.

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