

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

---

IN THE MATTER OF

Petition of the Dobbins Company d/b/a Sky Sight Imaging for Amendment to Exemption  
No. 11373

Docket Number: FAA-2015-0060

---

**COMMENTS OF THE SMALL UAV COALITION**

Gregory S. Walden  
Akin Gump Strauss Hauer & Feld LLP  
1333 New Hampshire Ave, N.W.  
Washington, D.C. 20036  
(202) 887-4000  
*Counsel to the Small UAV Coalition*

May 2, 2016

Filed with [www.regulations.gov](http://www.regulations.gov)

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

---

**IN THE MATTER OF**

**Petition of Dobbins Company d/b/a Sky Sight Imaging for Amendment to Exemption No. 11373**

**Docket Number: FAA-2015-0060**

---

**COMMENTS OF THE SMALL UAV COALITION**

**Introduction**

The Small UAV Coalition<sup>1</sup> is pleased to provide its comments in support of the petition by the Dobbins Company d/b/a Sky Sight Imaging (“Dobbins”) for an amendment to Exemption No. 11373 to operate its small unmanned aircraft system (“sUAS”) no closer than 200 feet of commercial structures and closer when inspecting the underside of roads and bridges.

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. 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 relief requested by Dobbins in its petition for an amended exemption.

The Coalition supports Dobbins’ request to conduct inspections as close as 200 feet from nonparticipating commercial structures. In Coalition comments on the FAA’s sUAS proposed rule, we urged the FAA to allow small UAV operations closer than 500 feet from non-involved persons and structures with appropriate conditions and limitations, noting that without such permission many UAS use cases, such as inspection of cell towers as Dobbins intends to do, would not be practical. As a result, such operations would continue to be conducted using manned helicopters, increasing the safety risks to persons on the ground as well as to helicopter

---

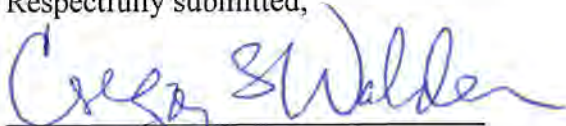
<sup>1</sup> Members of the Small UAV Coalition include AirMap, AGI, Amazon Prime Air, Botlink, Flirtey, Google[x] Project Wing, Intel, Kespry, PrecisionHawk, Strat-Aero, T-Mobile, Verizon Ventures, Walmart, and Zero Tech.

operators. The Coalition believes that the commercial structure provides a barrier between the proposed UAS operations and persons who may be present in those structures.

We also support Dobbins' request to operate under transportation bridges, presumably at a distance closer than 200 feet. We believe these operations may be conducted without additional risk to vehicles, vehicle operators or pedestrians, because the bridge provide a concrete or steel barrier, and the FAA has determined that such protection allows for operations closer than 500 feet to non-participating persons and vessels. Bridge inspection by an unmanned aircraft system is much safer than by a human in a boat or on foot or a manned helicopter.

Accordingly, the Coalition supports Dobbins' petition for amendment of Exemption No. 11373.

Respectfully submitted,



Gregory S. Walden  
Akin Gump Strauss Hauer & Feld LLP  
1333 New Hampshire Ave, N.W.  
Washington, D.C. 20036  
(202) 887-4000  
*Counsel to the Small UAV Coalition*

May 2, 2016