

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

IN THE MATTER OF

Petition of O'Connor Aerial Videos & Editing LLC for Amendment to Exemption No.
12236

Docket Number: FAA-2015-1928

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 O'Connor Aerial Videos & Editing LLC ("O'Connor") for an amendment to Exemption No. 12236 to permit O'Connor to operate its small unmanned aircraft (DJI Phantom 2 and 3 models) using a pilot who does not hold an airman certificate and without the presence of a visual observer.²

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 O'Connor in its petition for amendment.

Airman certification

The Coalition supports O'Connor's request to use a non-FAA certificated pilot to operate these UAVs under 200 feet AGL, in Class G airspace, within 1,500 feet of the operator. The Coalition, in its comments to the FAA's sUAS proposed rule, urged the FAA to adopt small UAS operator qualifications that matched 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 a

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

² The Coalition does not take a position on O'Connor's request for additional relief.

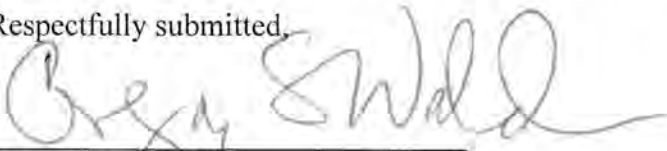
small UAS operator to pass only an aeronautical knowledge test, and not require the holding of a commercial, private, recreational, or sport pilot certificate. 80 Fed. Reg. at 9588 (proposed Part 107, Subpart C). As the Coalition has stated in its comments on the sUAS proposed rule and in comments in 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, and replace that requirement with an aeronautical knowledge test.

Visual Observer

While the FAA has required section 333 exemption holders to use a visual observer, the FAA has proposed in the sUAS rule (proposed 14 C.F.R. 107.33) that a visual observer will not be required for operations within the visual line of sight of the pilot, and the Coalition supported that determination in comments filed on the proposed rule. O'Connor explains that its operations will be below 200 feet AGL and within 1,500 feet of the pilot.

The Coalition supports O'Connor's petition to operate its UAS without an airman certificate and without a visual observer, under the conditions and limitations outlined its petition for amendment, this letter, and other conditions and limitations the FAA deems necessary.

Respectfully submitted,



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