

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

IN THE MATTER OF

Petition of PrecisionHawk USA, Inc. for Exemption

Docket Number: FAA-2016-0363

COMMENTS OF THE SMALL UAV COALITION

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The Small UAV Coalition¹ is pleased to provide its comments in support of PrecisionHawk USA Inc.'s ("PrecisionHawk") petition for exemption under 49 U.S.C. §44701(f) to permit PrecisionHawk to operate its Lancaster Hawkeye Mk III and other small unmanned aircraft systems ("sUAS") in extended visual line of sight ("EVLOS") as part of the Federal Aviation Administration's ("FAA's") Focus Area Pathfinder Program and PrecisionHawk's Cooperative Research and Development Agreement ("CRDA") with the FAA.

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 FAA for establishing its Pathfinder Program, and strongly support this program and similar research, development, and testing initiatives. The Coalition believes there are additional steps the FAA can take to broaden the authority to conduct commercial operations as part of the section 333 process as well as its general statutory exemption authority. In particular, the FAA has the authority and the discretion to grant the relief requested by PrecisionHawk in its petition, which relief was previously granted to PrecisionHawk in its section 333 exemption, Exemption No. 11345 (April 16, 2015)(FAA 2015-0048).

The Coalition is pleased that the FAA is moving forward with EVLOS research and testing as part of its Pathfinder Program. The proposed PrecisionHawk operations, to be conducted largely

¹ PrecisionHawk is a member of the Small UAV Coalition. Other members include AirMap, AGI, Amazon Prime Air, Botlink, Flirtey, Google[x] Project Wing, Intel, Kespry, Strat-Aero, T-Mobile, Verizon Ventures, and Zero Tech.

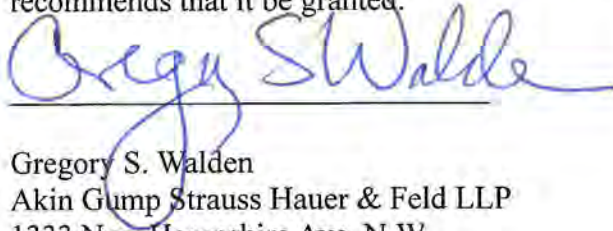
over remote and rural areas are well-suited to serve as the initial testing project for EVLOS operations, because of their much lower risk profile.

PrecisionHawk asks for exemptions with respect to commercial pilot certification (14 C.F.R. §61.113(a)), minimum altitude (14 C.F.R. §91.119), and altimeter (14 C.F.R. §91.151) requirements. The FAA has granted thousands of section 333 exemptions from these regulations, and PrecisionHawk should be granted the same relief.

PrecisionHawk also asks for an exemption from 14 C.F.R. §91.151 to operate its UAS with approximately two minutes remaining, rather than the five minutes required in standard section 333 petitions or the longer reserve requirement in section 91.151. The Lancaster Mk III uses a battery charge algorithm that automatically lands the UAV with about two minutes of battery power remaining. Given the light weight of its UAS, this time should provide a sufficient margin of safety.

We strongly support PrecisionHawk's petition, because these EVLOS operations will help advance the FAA's and industry's knowledge and experience with operations beyond the visual line of sight of the operator, a necessary element for safe operations in most operational environments, as well as in the operational ecosystem contemplated in a Unmanned Traffic Management ("UTM") system.

Accordingly, the Small UAV Coalition strongly supports PrecisionHawk's petition and recommends that it be granted.



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