

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

IN THE MATTER OF

Petition of Alaska Aerial Media, LLC for Amendment to Exemption No. 11426

Docket Number: FAA-2015-0173

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

January 18, 2017

Filed with www.regulations.gov

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

IN THE MATTER OF

Petition of Alaska Aerial Media, LLC for Amendment to Exemption No. 11426

Docket Number: FAA-2015-0173

COMMENTS OF THE SMALL UAV COALITION

Introduction

The Small UAV Coalition¹ is pleased to provide its comments in support of the petition by Alaska Aerial Media, LLC (“Alaska Aerial Media”) for an amendment to Exemption No. 11426, in order to operate an unmanned aircraft system (UAS) with a maximum takeoff weight of 66 pounds (with payload) for the purposes of aerial data collection, closed-set motion picture filming, and emergency response.

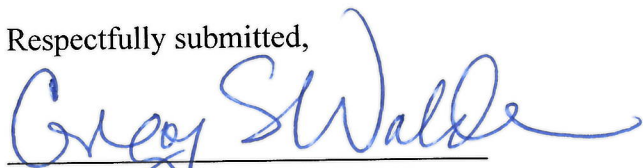
Members of the Small UAV Coalition share an interest in advancing regulatory and policy changes that will permit the operation of UAS in the near term, within and beyond the line of sight, with varying degrees of autonomy, for commercial, civil, and philanthropic purposes. The Coalition believes there 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 Alaska Aerial Media in its petition.

Furthermore, last year the FAA granted Exemption No. 11488 to Yamaha Motor Corporation, U.S.A. to operate a UAS weighing over 200 pounds – 141 lbs. empty weight and 61 lbs. of payload – to conduct agricultural operations, subject to the standard conditions and limitations and special conditions related to the weight of the UAS (e.g., limiting the speed of the UAV to 45 mph). The Coalition supports Alaska Aerial Media’s petition to conduct similar operations to those authorized in Exemption No. 11488, in consideration of the FAA’s conditions and limitations in that exemption and in previous exemptions, which mitigate safety risks to persons and property.

¹ Members of the Small UAV Coalition include AirMap, AGI, Amazon Prime Air, Flirtey, Fresh Air Educators, Google[x] Project Wing, Intel, Kespry, PrecisionHawk, T-Mobile, Verizon Ventures, and Walmart.

Accordingly, the Coalition supports Alaska Aerial Media's petition for amendment.

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

January 18, 2017