

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

IN THE MATTER OF

Petition of SkyFly Cinema, LLC for Amendment to Exemption No. 16842

Docket Number: FAA-2015-7598

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

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Introduction

The Small UAV Coalition¹ is pleased to provide its comments in support of the petition by SkyFly Cinema, LLC (“SkyFly Cinema”) requesting an amendment to Exemption No. 16842 in order to operate an unmanned aircraft system (UAS) with a full takeoff weight of 71 pounds for the purposes of aerial photography, videography, and cinematography.²

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 SkyFly Cinema in its petition.

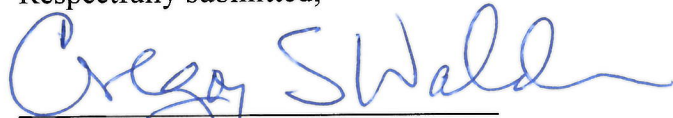
Furthermore, in 2015 the FAA granted Exemption No. 11488 to Yamaha Motor Corporation, U.S.A. to operate a UAS weighing over 200 pounds – 141 lbs. empty weight and 61 lbs. of payload – to conduct agricultural operations, subject to the standard conditions and limitations and special conditions related to the weight of the UAS (e.g., limiting the speed of the UAV to 45 mph). The Coalition supports SkyFly Cinema’s petition to conduct operations of a UAS that weighs over 55 pounds subject to the conditions and limitations the FAA imposed in Exemption No. 11488, which mitigate safety risks to persons and property.

Accordingly, the Coalition supports SkyFly Cinema’s petition for amendment.

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.

² SkyFly’s petition dated October 13, 2015 was granted in Exemption No. 16842, but that exemption was limited to UAS weighing no more than 55 pounds.

Respectfully submitted,



Gregory S. Walden
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Counsel to the Small UAV Coalition

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