



**SMALL UAV**  
COALITION  
*A Partnership for  
Safety & Innovation*

April 24, 2018

The Honorable Paul Ryan  
Speaker  
United States House of Representatives  
H-232, The Capitol  
Washington, DC 20515

The Honorable Nancy Pelosi  
Democratic Leader  
United States House of Representatives  
H-204, The Capitol  
Washington, DC 20515

The Honorable Bill Shuster  
Chairman  
Committee on Transportation and  
Infrastructure  
United States House of Representatives  
2251 Rayburn House Office Building  
Washington, DC 20515

The Honorable Peter DeFazio  
Ranking Member  
Committee on Transportation and  
Infrastructure  
United States House of Representatives  
2164 Rayburn House Office Building  
Washington, DC 20515

Dear Speaker Ryan, Leader Pelosi, Chairman Shuster, and Ranking Member DeFazio:

The Small UAV Coalition<sup>1</sup> is pleased that the House of Representatives will this week consider long-term FAA reauthorization legislation that demonstrates Congress' commitment to the continued growth of the commercial unmanned aircraft systems (UAS) industry in the United States. As the bill moves to the floor, the Coalition underscores its strong support for Section 45510, which would safely enable UAS to carry property for compensation or hire. Further, the Coalition refutes any assertions that Section 45510 would erode the important role that states and localities play in UAS integration efforts.

The United States' lack of a regulatory framework specifically tailored to UAS delivery operations jeopardizes its role as the world's leader in innovative commercial UAS applications. Section 45510, as included in the underlying bipartisan bill, is necessary for the FAA to establish a rigorous, risk-based, air carrier safety certification process for UAS operators without imposing burdensome requirements that while appropriate for manned aircraft, are not appropriate for UAS.

Section 45510 carries forth the longstanding precedent of federal regulatory authority over aviation operations engaging in interstate commerce. This ensures that operators are subject to one uniform set of economic and safety regulations and recognizes the FAA's unparalleled safety expertise that makes the United States' airspace the safest in the world.

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<sup>1</sup> Members of the Small UAV Coalition are Amazon Prime Air, X Project Wing, Intel, Kespry, PrecisionHawk, Verizon, AGI, Airmap, Flirtey, Fresh Air Educators, T-Mobile, and Walmart.

While Part 107, the first and current regulatory framework for commercial UAS operations, was a welcome first step towards widespread UAS integration into the national airspace, it is an operational rule, rather than a certification rule, and does not provide a pathway towards ubiquitous delivery operations.

For these reasons, the Small UAV Coalition strongly supports Section 45510 as written and objects to any efforts to undermine the FAA's oversight of the safety and operations of interstate commerce in the national airspace.

Sincerely,

