



July 31, 2018

To the Members of the United States Senate:

The undersigned organizations strongly oppose an amendment expected to be offered by Senator Lee to long-term FAA reauthorization legislation that would not only jeopardize the growth and success of the commercial unmanned aircraft systems (UAS) industry in the United States, but would also set a dangerous precedent for the continued safe and efficient use of the national airspace.

The amendment would reregulate an industry that has been free from state and local government economic regulation of air carriers since the Airline Deregulation Act of 1978 (ADA). With ADA's passage, Congress preempted state and local governments from regulating the rates, routes, and services of airlines. This preemption is also important to the UAS industry. Walking back this standard threatens the continued efficiency of our national airspace and would create undue burdens on those who operate within it. It would also encourage those who wish to narrow the scope of the ADA preemption provision with respect to manned aviation operations.

If adopted, the amendment would allow thousands of state and local government to impose restrictions on commercial UAS air carrier operations, creating inefficiencies that will stifle innovation and discourage investment and competition. This will inhibit the United States from embracing the economic potential and consumer benefits of drone delivery, which other countries – including China, Australia, Canada, and Switzerland – have already embraced and continue to compete for investment in this technology.

Without routine UAS delivery operations, the United States will deprive itself of the immense humanitarian potential of this technology. Drones can deliver medical supplies, blood, food, and water to remote or disaster-stricken areas. A patchwork of regulations would impede efforts to meet these unexpected and time-sensitive needs. These types of missions are already taking place in other parts of the world, but will not be replicated here if this amendment is adopted.

While the amendment is specific to UAS air carrier, or delivery, operations, it would have a chilling effect throughout the commercial UAS and broader technology industries. If the potential for a major application like delivery is taken off the table, there is less incentive for investment in technologies that will support the continued safety, security, and growth of UAS technology, endangering the future of other critical applications.

Finally, the amendment jeopardizes the success of the Department of Transportation's UAS Integration Pilot Program (IPP), in which state and local entities are working with private sector partners to demonstrate expanded commercial UAS operations and evaluate the potential impacts of local time, place, and manner regulations. The amendment would not only impede operations under IPP, but also undermine one of its core missions and discourage others from seeking to participate in this exciting and important initiative.

For these reasons, we strongly oppose the amendment and encourage the Senate to reject it as a threat to the continued growth of this exciting industry and as an unwarranted departure from the 40-year standard of economic deregulation of the airline industry. Thank you for your attention to this important matter.

Sincerely,

Aerospace Industries Association (AIA)
Aircraft Owners and Pilots Association (AOPA)
Association for Unmanned Vehicle Systems International (AUVSI)
Consumer Technology Association (CTA)
General Aviation Manufacturers Association (GAMA)
Helicopter Association International (HAI)
National Air Carrier Association (NACA)
National Business Aviation Association (NBAA)
Small UAV Coalition
U.S. Chamber Technology Engagement Center (C_TEC)