

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

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**IN THE MATTER OF**

**Petition of 3GLP, Inc. d/b/a Precision Flight Devices for Exemption**

**Docket No. FAA-2018-0325**

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**COMMENTS OF THE SMALL UAV COALITION**

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The Small UAV Coalition<sup>1</sup> is pleased to provide its comments in support of the petition by 3GLP, Inc. d/b/a Precision Flight Devices (“Precision”) for an exemption to operate the CW-30, a vertical takeoff and land (“VTOL”) unmanned aircraft system (“UAS”) weighing about 75 pounds to perform photography, surveying, mapping and other data collection within a 15.56 square mile area around two airfields in western Alaska.

Precision would likely be able to operate within the parameters of Part 107 except for the weight of the UAV. The benefits in operating a UAS in place of humans or even conventional aircraft to inspect tall structures, wetlands, and steep terrain or infrastructure are well known. 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 and other civil purposes. The Coalition believes that granting this petition will help to advance this objective.

Precision has developed its own training, operations, and maintenance program, including a safety management system, that goes beyond what FAA requires under Part 107. Because a VTOL aircraft is also a rotorcraft, Precision seeks an exemption from the airworthiness certification requirement in Part 27. An exemption is warranted for the same reasons an airworthiness certificate is not required under Part 107, and in consideration of the safety measure Precision has adopted.

Precision will operate the CW-30 only in uncontrolled airspace, within the visual line of sight of the remote pilot and observer. The UAS will be operated at a lateral distance of at least 500 feet

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

from non-shielded non-participants, except that it may be operated within 200 feet with the FAA's approval.

With respect to Precision's request for exemption from certain Part 61 requirements, the Coalition believes that obtaining a remote pilot certificate under Part 107 should be sufficient for an operation under section 333. With the adoption of Part 107, the FAA should accept a remote pilot certificate in lieu of a Part 61 airman certificate. Precision's pilots hold remote pilot certificates and will observe additional training requirements.

Precision seeks exemption from certain Part 91 requirements, from which FAA has granted many section 333 exemptions. For example, FAA has accepted GPS as an acceptable alternative to an altimeter. Most of the Part 91 requirements for which Precision seeks an exemption are not included in Part 107.

The Small UAV Coalition supports Precision's petition in consideration of the safety features and measures of the CW-30, and the additional operational limitations stated in its petition. Accordingly, the Coalition supports Precision's petition for exemption.

Respectfully submitted,



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