

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

IN THE MATTER OF

Petition of Yamaha Motor Corporation, U.S.A. for Exemption

Docket No. FAA-2018-0182

COMMENTS OF THE SMALL UAV COALITION

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August 21, 2018

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The Small UAV Coalition¹ is pleased to provide its comments in support of the petition by Yamaha Motor Corporation, U.S.A. (“Yamaha”) for an exemption to operate the FAZER R, a remotely-piloted helicopter weighing up to 241.3 pounds with payload, for crop spraying, sensing, and imaging operations in the agriculture industry.

Unmanned Aircraft Systems (“UAS”) offer a safe and efficient means of conducting a variety of agricultural operations. Among the benefits Yamaha cites are greater operator safety on steep or slippery hills and terrain, reduced chemical usage, reduced operator and other human exposure to chemicals, no crop damage or soil compaction, and greater fuel efficiency. 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.

Yamaha states that the FAZER R UAS is currently going through the type and production certification process with the FAA, and has used a safety risk management approach in this process. Yamaha asserts that the operation of the FAZER R will be subject to “the same training, certification, operating, manufacturing, maintenance, and other requirements and restrictions prescribed in the Type and Production Certificates.” Yamaha has developed training and certification protocols for its pilots and visual observers and lists its onboard safety systems, including its failsafe mode for a loss of communications link. Yamaha further states that the UAS will operate in remote or sparsely populated areas within defined setbacks. These and other operational conditions are intended to ensure the safety of persons on the ground.

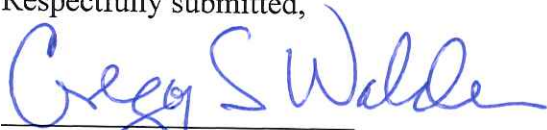
¹ Members of the Small UAV Coalition include AirMap, AGI, Amazon Prime Air, Flirtey, Fresh Air Educators, Google [x] Project Wing, Intel, Kespry, Paladin Drones, Percepto, PrecisionHawk, T-Mobile, and Verizon Ventures.

With respect to Yamaha's request for exemption from certain Part 61 and Part 137 requirements relating to pilot certification, the Coalition believes that obtaining a remote pilot certificate under Part 107 should be sufficient for an operation under section 333, including an operation under Part 137. With the adoption of Part 107, the FAA should accept a remote pilot certificate in lieu of a Part 61 airman certificate and exempt such a certificated pilot from the Part 137 pilot requirements.

Yamaha 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. Seeking an exemption from the 20-minute reserve fuel requirement makes sense for any operation not expected to last more than 10-15 minutes.

The Small UAV Coalition supports Yamaha's petition in consideration of its agreement to comply with the conditions and restrictions the FAA imposes in the certification process for the FAZER R, and the additional operational limitations stated in its petition. Accordingly, the Coalition supports Yamaha's petition for exemption.

Respectfully submitted,



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