

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

IN THE MATTER OF

Petition of Latitude Engineering, LLC for Exemption

Docket No. FAA-2018-0619

COMMENTS OF THE SMALL UAV COALITION

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The Small UAV Coalition¹ is pleased to provide its comments in support of the petition by Latitude Engineering, LLC (“Latitude”) for an exemption to operate its HQ-60 and HQ-90 unmanned aircraft weighing more than 55 pounds for the collection of aerial data at and with the support of small airports in Alaska, Arizona, and Virginia. The maximum gross takeoff weight for both aircraft is 104 lbs.

Unmanned Aircraft Systems (“UAS”) offer a safe and efficient means of conducting a variety of operations. 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, including UAS that weigh more than 55 pounds. The Coalition believes that granting this petition will help to advance this objective.

The two UAS are both hybrid quadcopters that will conduct Vertical Takeoffs and Landings (VTOL) with an electric motor and use a gas engine for forward flight. Latitude states that it has operated its UAS for the Departments of Defense and Energy, and the National Aeronautics and Space Administration (NASA).

Latitude states that it will comply with the standard conditions and limitations FAA has imposed when granting section 333 exemptions. In particular, Latitude will operate within the visual line of sight of its pilots, who will hold at least a private pilot airman certificate. It will not operate at night. The UAS is equipped with collision avoidance lights for visibility, and will be equipped with a transponder given that it will operate to and from small airports subject to agreement with the airport operator. The UAS will have functions to return to home and land immediately, and

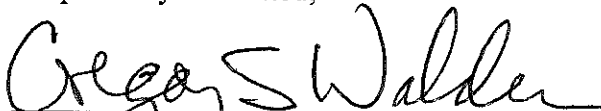
¹ Members of the Small UAV Coalition are listed in www.smalluavcoalition.org.

will have geo-fencing capabilities. The only difference between operations that were routinely given section 333 exemptions and operations now authorized under Part 107 is the weight of Latitude's unmanned aircraft.

With respect to the operating environment, Latitude has secured an agreement with the airport operator to take off and land at Benson Municipal Airport in Benson, Arizona, a non-towered airport located in Class G airspace. The other airports are those participating in the Mid-Atlantic Aviation Partnership (MAAP), the Warrenton-Fauquier Airport in Virginia, and airports in Alaska that are part of planned UAS Arctic Operations. The Coalition also supports Latitude's petition as its experience operating at non-towered airfields in coordination with airport operators and manned general aviation traffic will foster the integration of UAS operations in the navigable airspace.

In sum, the Small UAV Coalition supports Latitude's petition in consideration of its agreement to comply with the conditions and restrictions the FAA has imposed in section 333 petitions, the many safety features detailed in its petition, and its experience conducting operations for Federal government agencies. Accordingly, the Coalition requests the FAA grant Latitude's petition for exemption.

Respectfully submitted,



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