

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

IN THE MATTER OF

Petition of Aeronex, Inc. for Exemption

Docket No. FAA-2019-0011

COMMENTS OF THE SMALL UAV COALITION

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May 1, 2019

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The Small UAV Coalition¹ is pleased to provide its comments in support of the petition by Aeronex, Inc. (“Aeronex”) for an exemption to allow it to operate a tethered unmanned aircraft system with maximum takeoff weight (including payload) of approximately 260 lbs. to clean, service, and maintain infrastructure.²

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 in the near term permit the operation of UAS – including large UAS – within and beyond the line of sight, with varying degrees of autonomy, for commercial and other civil purposes. The Coalition believes that granting this and other petitions that seek to operate heavier drones will help advance this objective.

Aeronex does not seek any relief from Part 107 requirements; the only relief sought is from the 55 lb. limit. Thus, Aeronex will comply with the conditions and restrictions in Part 107. Moreover, the UAS operations will be conducted with a tethered drone, which will fly over areas that are secure from non-participants through a barricade, signage, or by safety personnel. Aeronex will also use a visual observer. The Coalition agrees that there is a significant reduction in risk in using drones instead of human beings, who would be required “to be suspended precariously from a manned helicopter or rigging/repelling from an elevated anchor point.” The use of UAS instead of manned helicopters eliminates the risk to the crew as well as reduces the risk as to persons on the ground.

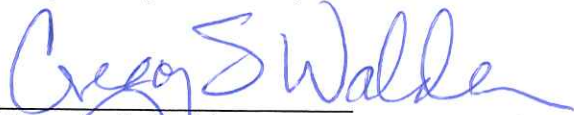
Aeronex’ UAS includes several redundant systems, including 28 independent batteries, and incorporates three ballistic ejection parachutes to reduce the risk of injury if the UAS loses power.

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

² While Aeronex requests an exemption under section 333, that section has been replaced by 49 U.S.C. §44807.

The Small UAV Coalition supports Aeronex' petition, in consideration of the many safety features detailed in its petition and the particular operational environments where it will operate. Accordingly, the Coalition requests the FAA grant Aeronex' petition for exemption.

Respectfully submitted,



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