

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

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**IN THE MATTER OF**

**Petition of Bell Helicopter Textron for Exemption**

**Docket No. FAA-2018-0097**

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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 Bell Helicopter Textron (“Bell”) for an exemption to operate its xFold DragonH unmanned aircraft system (“UAS”) manufactured by ZM Interactive Inc. The xFold DragonH is a 12-motor vertical takeoff and landing (“VTOL”) UAS capable of carrying 440 lbs. of payload for a maximum takeoff gross weight (“MTOW”) of 4780 lbs. Bell is in the process of obtaining an experimental category airworthiness certificate. As such, its operations will be limited to research and development (“R&D”). Bell proposes to operate its UAS over sparsely populated areas in Palo Pinto County in north central Texas.

Unmanned aircraft systems 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. This includes operations of UAS with a MTOW over 55 lbs., which may be operated only under an exemption under 49 U.S.C. 44807 (formerly section 333 of the FAA Modernization of 2012).

Bell’s pilots will hold a private pilot certificate, which FAA has previously approved for operation in section 333 exemptions.

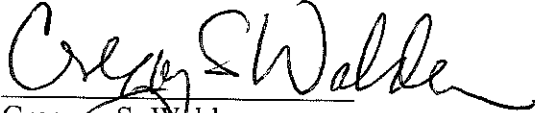
Bell will operate the xFold DragonH UAS at an altitude not to exceed 400 feet AGL. It will keep its UAS at least 500 feet from any house, barn, or actively used structure. It appears from the petition that Bell will operate largely within the parameters of Part 107, except for the weight of the UAS when including the payload.

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<sup>1</sup> Members of the Small UAV Coalition are listed at [www.smalluavcoalition.org](http://www.smalluavcoalition.org).

For the reasons stated above, the Coalition endorses Bell's petition in furtherance of R&D operations using a UAS with payload over 55 lbs. Accordingly, the Coalition requests the FAA to grant Bell's petition for exemption.

Respectfully submitted,



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