Drone Manufacturers Alliance

June 3, 2016

Attention: Mabel Echols, mabel_e._echols@omb.eop.gov, OIRA_Submission@OMB.EOP.gov
Office of Information and Regulatory Affairs
Office of Management and Budget
NEOB, Room 10235
725 17th Street, NW
Washington, DC 20503

RE: Federal Aviation Administration, Notice of Proposed Rulemaking Concerning Operation and Certification of Small Unmanned Aircraft Systems, RIN 2120-AJ60

The Drone Manufacturers Alliance is a newly formed alliance of the world's leading UAS manufacturers, 3D Robotics, DJI, GoPro and Parrot. The mission of the alliance is to serve as the voice for drone manufacturers and our customers across civilian, governmental, recreational, commercial, nonprofit and public safety applications; and to advocate for policies that promote safety, innovation and a practical and responsible regulatory framework.

We are working to promote a better understanding of drone technology and the important role drone innovation plays in safety and the economic growth of communities, companies, and individuals worldwide.

We would like to take the opportunity to express our views on the Notice of Proposed Rulemaking Concerning Operation and Certification of Small Unmanned Aircraft Systems (RIN 2120-AJ60).

The Drone Manufacturers Alliance supports the FAA's proposed risk-based, incremental regulatory framework for small UAS, specifically its focus on performance standards and a risk-based approach to aircraft and airmen certification. We are hopeful the final rule preserves the common-sense approach described in the NPRM, which we believe will help promote compliance and support.

The Drone Manufacturers Alliance supports the FAA's proposed risk-based, incremental regulatory framework for small UAS, specifically its focus on performance standards and a risk-based approach to aircraft and airmen certification. We believe the rule could be improved with the creation of a separate weight-based category for micro UAS, as contemplated in the NPRM. We were pleased to participate the FAA's recent Micro Unmanned Aircraft Systems (UAS) Aviation Rulemaking Committee (the "ARC"), in order to provide recommendations to the FAA Administrator on a regulatory framework for the classification and operation of micro UAS operating over people. However, it is important to note, the ARC was not chartered to establish a weight-based category as described by the micro-UAS classification in the NPRM. The stated objective of the ARC was to consider recommendations for a performance-based standard that would allow for UAS to be operated over people who are not directly

participating in the operation of the UAS." We believe a micro UAS category of devices under 4.4 pounds should be established that provides a lower barrier to entry for those seeking beneficial commercial uses of this technology, and a simplified set of rules that are easy and effective to communicate to our customers.

We would highlight the following sections:

Existing Regulation:

Aircraft Certification - We strongly support the FAA's proposal to remove small UAS from the aircraft certification requirements under Part 21.

Aircraft Maintenance - We strongly support the FAA's proposal to remove small UAS from the aircraft maintenance requirements under Part 21.

Aircraft Registration - We participated in and supported the FAA's Registration Task Force to create a registration system for all small UAS. We believe the new system supports the FAA's proposal to remove small UAS from the aircraft identification and marking requirements under Parts 45 and 47.

Small UAS Operator - We generally support the FAA's proposed operational requirements for operators of small UAS, including the removal from Part 61 and the modifications to Part 91.

Proposed Part 107:

Aircraft Certification - We support the FAA's clear exemption from an airworthiness certificate and believe the FAA strikes the correct balance with requirements for preflight inspection and prohibition on flight when the UAS is in an unsafe condition. As manufacturers of small UAS, we believe operators should adhere to our guidance for maintenance and other operational capabilities.

Small UAS Operations - We agree with the FAA that operators should be prohibited from careless or reckless operations and dropping an object that endangers the life or property of another. However, we would urge the final rule to allow for night-time operations and "beyond visual-line-of-sight", including mitigation that provides for the equivalent level of safety. Mitigation is critical for micro UAS that have an inherently lower risk profile than larger UAS, as recognized by the FAA in establishing the ARC to develop performance-based standards that would allow for micro UAS to be operated over people who are not directly participating in the operation of the UAS or under a covered structure.

We would also express concerns with certain operational limitations related to geographic location and altitude. We would urge the final rule to adopt flexible procedures that allow for certain operations above 500 feet AGL and within restricted airspace near airports and heliports.

Airman Certification - We support the FAA's proposal to require an aeronautical knowledge test, provided the test can be conducted and completed online from any location. However, we would note the need for an aeronautical knowledge test should be eliminated in a micro category of operations.

Thank you for the opportunity to submit these comments. Please contact Kara Calvert, Director of the Drone Manufacturers Alliance at 202-744-6987 or kcalvert@franklinsquaregroup.com with any specific questions.

Respectfully submitted,

Kara Calvert, Director
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