

Small UAS NPRM

Broad areas of interest and concern in proposed Part 107

- Impact on aviation safety
- Commercial viability of small UAS
- Financial impact on other stakeholders
- Cost to agency/taxpayer in the management, regulation, surveillance of small UAS
- Maintaining or reacquiring leadership in a significant segment of the overall UAS market.

Assumptions

- NPRM has not been released for comment
- Input provided solely based on previous rulemaking and road map development experience
 - Served as member of small UAS ARC
 - Current member of UAS ARC
- Significant and continuing interaction with FAA

Specifics

- Applicability
 - Definition of small unmanned aircraft may include “recreational” users
 - Conjecture that recreational operators will be included in the rule IF operations are not conducted under some community based standard or sanction (AMA)

Specifics

- Registration
 - Recent interpretive rules lead us to believe that a registration requirement will be imposed.
 - Will FAA be able to manage the volume under present procedure?
 - Will unsanctioned modelers be required to register aircraft?

Specifics

- Airworthiness
 - Status and cost associates with ASTM standards application to small UAS
 - Do the current and evolving ASTM F-38 apply
 - How much do they differ from the proposed rule?
 - Airworthiness Directives
 - AD's on a self certified aircraft

Specifics

- Commercial viability concerns
 - VLOS operation only
 - No "daisy chaining"
 - Severely limits or eliminates many AG applications
 - No flight over people not associated with the operation
 - Limits viability for approved Section 333 exemption recipients

Specifics

- Market leadership
 - Off shore regulators more realistic about small UAS operations at low altitudes
 - Transport Canada most recent
 - Australia CASA
 - Far more "liberal" attitude on offering airspace <500' AGL

General Observations

- Any rulemaking is better than no rulemaking
 - Exemption opportunities
- Questions about the true safety analysis and risk assessment associated with very low altitude/light weight/low mass vehicles operating in the NAS.
- Is the rule unnecessarily restrictive based on applicability?