

May 15, 2019

The Honorable Russell Vought
Acting Director
Office of Management and Budget
725 17th St NW
Washington, D.C. 20503

Dear Mr. Vought:

We write regarding the Federal Aviation Administration's (FAA) planned "Remote Identification of Unmanned Aircraft Systems" rulemaking (remote identification). As leading industry associations, aviation stakeholders, and labor unions, we all have significant concerns pertaining to the continued delay of the remote identification rulemaking and the adverse implications of that delay on the safety and security of airspace as well as on the future of the unmanned aircraft systems (UAS) industry. We urge the Administration to convene key federal agency stakeholders including the FAA, the Department of Defense, the Department of Homeland Security, and the Department of Justice to collaborate on publishing a rule on remote identification without further delay.

Recent incidents of unauthorized UAS operations underscore the risk that reckless UAS operations pose to the safety and security of the airspace. Given that the FAA projects the number of commercial and recreational UAS to more than double by 2022, it is imperative that we have a federal regulatory framework to detect and identify UAS. Remote identification, also a priority for the law enforcement community, will provide a solution to safely integrate existing and additional UAS into the airspace. Unfortunately, regulatory action on remote identification, previously set to publish on May 1st, 2019, was delayed until July 21st, 2019, causing uncertainty for industry and increasing risk to other users in the airspace.

Increased UAS integration is expected to bring numerous benefits to consumers and support public safety. However, careless and criminal use of UAS can pose significant risks to manned aircraft operations, interfere with emergency and law enforcement operations, and endanger critical infrastructure. Full implementation of remote identification will provide the capability to identify friend and foe, strengthen privacy protections, and importantly underlies the other features essential for the safe integration of UAS – counter-drone systems and UAS traffic management.

In addition to addressing the safety and security risks, remote identification will unlock the benefits of advanced UAS operations that will allow for the United States to lead in developing innovative UAS applications such as delivery, surveying, filmmaking, and search and rescue. For example, the final rule on "Operation of Small Unmanned Aircraft Systems Over People" is contingent upon a final action on remote identification. Failure to expeditiously address remote identification curtails these expanded operations, hinders U.S. global competitiveness, and increases the likelihood that innovation will move overseas.

We recognize that the FAA has taken a number of important steps to advance remote identification, notably through establishment of the UAS Remote Identification and Tracking Aviation Rulemaking Committee as well as the UAS Remote Identification Request for Information. However, it is imperative

that the FAA and the other relevant federal stakeholders recognize the critical nature of remote identification to the undersigned organizations and understand the risks posed by unnecessary delays. We appreciate the Administration providing the necessary leadership to encourage collaboration across agencies to address this challenge.

Realizing the full benefits of UAS integration and maintaining a safe and secure airspace can only be achieved with remote identification. We appreciate your consideration of our concerns and we look forward to working with the Administration as this process moves forward.

Sincerely,

Aerospace Industries Association
Air Line Pilots Association, International
Aircraft Owners and Pilots Association
Airlines for America
Airports Council International – North America
Alliance for Drone Innovation
American Association of Airport Executives
American Chemistry Council
American Fuel & Petrochemical Manufacturers
American Gas Association
American Petroleum Institute
American Property Casualty Insurance Association
Association of Unmanned Vehicle Systems International
Cargo Airline Association
Commercial Drone Alliance
CompTIA
Consumer Technology Association
CTIA
Edison Electric Institute
General Aviation Manufacturers Association
Helicopter Association International
Information Technology and Innovation Foundation
International Air Transport Association
National Air Transportation Association
National Association of Manufacturers
National Association of Mutual Insurance Companies
National Business Aviation Association
NetChoice
NetJets Association of Shared Aircraft Pilots
Nuclear Energy Institute
Security Industry Association
Small UAV Coalition
Southwest Airlines Pilots Association
U.S. Chamber of Commerce

CC: The Honorable Roger Wicker, Chairman, Senate Commerce Committee
The Honorable Maria Cantwell, Ranking Member, Senate Commerce Committee
The Honorable Peter DeFazio, Chairman, House Transportation and Infrastructure Committee
The Honorable Sam Graves, Ranking Member, House Transportation and Infrastructure Committee
The Honorable Patrick M. Shanahan, Acting Secretary, U.S. Department of Defense
The Honorable Elaine L. Chao, Secretary, U.S. Department of Transportation
The Honorable William P. Barr, Attorney General, U.S. Department of Justice
The Honorable Kevin McAleenan, Acting Secretary, U.S. Department of Homeland Security