



Meeting Between FIRST iZ™ and OIRA on Remote ID

Background:

FIRST iZ™, a Phirst Technologies, LLC. company, is paving the way in integrated drone systems for first responders. We provide a smart enclosure, the FIRST Port™, to house the drone, power it, offload data, and pair that with smart airframes, designed and manufactured in the United States. We envision a National Airspace System (NAS) where drones provide aerial intelligence to those that need it the most. Remote ID will allow these systems to operate safely alongside other users of the NAS.

FIRST iZ thanks OIRA for taking the time to discuss our unique views leading up to the FAA's proposed rulemaking on Remote ID.

Public and Civil UAS Have Different Needs

Much like the existing rules differ around operating a public UAS under a Certificate of Authorization and operating under Part 107, Remote ID should approach these two scenarios differently as well. The information sharing requirements and accessibility can be focused on the user, the location, and the level of security around the operation. We are not providing suggestions for a specific structure here, but would like this nuance considered.

Spectrum Will Play a Key Role

We have reviewed the ASTM F38 Remote ID framework, and believe it is a good start, but would also like to better understand potential communication alternatives with a focus on existing infrastructure. Specifically, is there any possibility of housing Remote ID on the current ADS-B spectrum such that a drone will only send an "out" signal when pinged by another device? This proposal would keep pilot screens from being overwhelmed and also not require the newest in wireless technology.

Recent studies coming from the FCC TAC UAS Working Group have shown that proposed technologies (Bluetooth and WiFi) have their shortcomings in urban environments. For Remote ID



to be effective, it will need to be reliable. Finding the right broadcast method will be essential to effectively integrating UAS into the NAS and maintaining an equivalent level of safety to existing users.

Privacy Concerns Will Shape Operator and Public Opinion

Without broad adoption, Remote ID will only be as strong as its weakest link, and many involved are concerned about privacy. There needs to be a balance struck between protecting the safety of operators, by shielding their personal information and location from those that do not need it, to assuring or alerting the general public to potentially nefarious drones.

Many groups before us have likened Remote ID to that of a license plate. We agree with this concept. The identifier can be further investigated by the proper authorities to actually uncover the identity of the user, as opposed to anyone being able to ascertain the information just from the number. This protection of privacy will allay concerns of hobbyist and commercial users alike while also providing a traceable means for any reporting needs.

Remote ID Must be Forward Looking

UAS are part of an ever evolving and growing technological ecosystem. As we unlock more complex operations that move into beyond visual line of sight (BVLOS), over people, and also start relying more heavily on autonomy, identification is a base for that future.

Wherever the mandate lies, it must be easy to equip, operate, and grow. UAS take many forms, and on the small side, they range from 250 grams up to 55 pounds. The future of drones will likely move us toward regular operations with larger airframes. So, the standards established now must consider that future and be able to quickly integrate into UAS Traffic Management.

Conclusion

We are nearing an inflection point where UAS are able to unlock even more value to keep people safe and efficient. If rules are developed that correctly characterize different users, effectively identify UAS with existing infrastructure, balance privacy protection, and consider our future, UAS



will accomplish great things in the United States and abroad. Remote ID is one very important part of that ongoing progress.

More about FIRST iZ

FIRST iZ is an innovator in unique drone ecosystems. We are working closely with first responders and providers of our nation's infrastructure to augment their existing workflows with drones.

FIRST iZ has a history and close relationship with fire, law enforcement, and emergency medical professionals, due to the FIRST iZ partnership with another company by the same founder, The Genesis Group. Genesis® develops communication software for public safety professionals and has recently celebrated 30 years in business. Through the power of Genesis PULSE®, a novel computer aided dispatch enhancement solution, the FIRST iZ drone system responds to calls autonomously. With eyes on the situation faster than possible with any other ground or air unit, first responders can prioritize their actions.

FIRST iZ operates with the idea, as stated by the FCC, that saving time saves lives. Our drone solutions will do just that.