

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

IN THE MATTER OF

Petition of SEESPAN, Inc. for Exemption

Docket Number: FAA-2015-1571

COMMENTS OF THE SMALL UAV COALITION

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March 16, 2016

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Introduction

The Small UAV Coalition¹ is pleased to provide its comments in support of the petition by SEESPAN, Inc. (“SEESPAN”) for an exemption to operate a tethered small unmanned aircraft system (“sUAS) no closer than 100 feet of persons not involved in the sUAS operation to photograph and film sporting events, entertainment, and to conduct news gathering.

Members of the Small UAV Coalition share an interest in advancing regulatory and policy changes that will permit the operation of small UAVs in the near term, within and beyond the line of sight, with varying degrees of autonomy, for commercial, consumer, recreational and philanthropic purposes. We applaud the Federal Aviation Administration (“FAA”) for accelerating the pace of exemptions. The Coalition believes there are additional steps the FAA can take to broaden the authority to conduct commercial operations. In particular, the FAA has the authority and the discretion to grant the relief requested by SEESPAN in its petition for exemption.

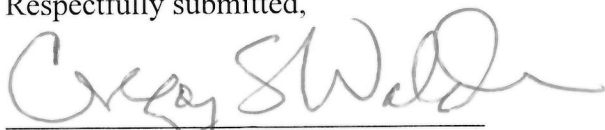
The Coalition supports SEESPAN’s request to cover news, entertainment and sporting events as close as 100 feet from persons not involved in the sUAS operation. In Coalition comments on the FAA’s sUAS proposed rule, we urged the FAA to allow small UAV operations over non-involved persons with appropriate conditions and limitations, noting that without such permission news gathering operations using a UAS would not be practical. As a result, news operations would continue to operate manned helicopters to cover breaking news events, increasing the safety risks to persons on the ground as well as to helicopter operators.

¹ Members of the Small UAV Coalition include 3D Robotics, AirMap, AGI, Amazon Prime Air, Botlink, DJI Innovations, Drone Deploy, Flirtey, Google[x] Project Wing, GoPro, Intel, Kespry, Parrot, PrecisionHawk, Strat-Aero, T-Mobile, Verizon Ventures, and Zero Tech.

In the absence of a final sUAS rule, an exemption from 14 C.F.R. §91.119 is likely required. The Coalition notes that manned helicopters are allowed to operate below the minimums set forth in section 91.119 if the operation is conducted “without hazard to persons or property on the ground” and in compliance with any routes or altitudes the FAA may prescribe for helicopters.” 14 C.F.R. §91.119(d). We note that SEESPAN will use a tethered UAV that has been tested in both laboratory and in the field, and agree with SEESPAN that a tether is a functional equivalent of a barrier, which the FAA requires to be present to authorize operations close than 500 feet to non-participating persons.

Accordingly, the Coalition supports SEESPAN’s petition for exemption.

Respectfully submitted,



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