

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

IN THE MATTER OF

Petition of Amazon.com for Amendment to Exemption No. 11290

Docket Number: FAA-2014-0474

COMMENTS OF THE SMALL UAV COALITION

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Introduction

The Small UAV Coalition¹ is pleased to provide its comments in support of the petition by Amazon.com (“Amazon”) for an amendment to Exemption No. 11290 to operate its small unmanned aircraft system (“sUAS) no closer than 200 feet of persons not involved in the sUAS operation for aerial data collection and research and development.

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. 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 Amazon in its petition for exemption.

The Coalition supports Amazon’s request to conduct research and development as well as aerial data collection as close as 200 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 many UAS use cases would not be practical. As a result, such operations would continue to operate manned helicopters, increasing the safety risks to persons on the ground as well as to helicopter operators.

We note that the FAA recently revised its policy with respect to operations closer than 500 feet from non-participating persons, differentiating between (1) persons directly participating in the

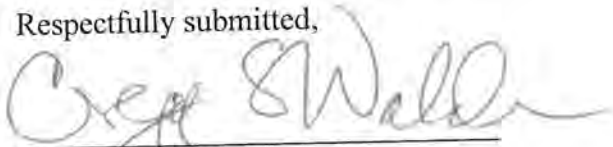
¹ Members of the Small UAV Coalition include AirMap, AGI, Amazon Prime Air, Botlink, DJI Innovations, Flirtey, Google[x] Project Wing, Intel, Kespri, Parrot, PrecisionHawk, Strat-Aero, T-Mobile, Verizon Ventures, and Zero Tech.

UAS operation, (2) persons directly participating in the intended purpose of the UAS operation, and (3) other persons. For the second category of persons, there is no minimum distance, provided these persons are briefed on the potential risks and consent to the operations. The operator must also file a plan of activities with the local FSDO at least 72 hours before the flight. For the third category of persons, the 500 foot distance remains.

Amazon seeks an exemption to operate no closer than 200 feet from the third category of persons. We agree with Amazon's statement that the FAA should adopt the same conditions in Exemption No. 11210 for operations at a distance of 200 feet from non-participating persons in Exemption No. 11290. Amazon will ensure that a no-fly area will be put in place in order to meet the requirement in 14 C.F.R. §91.119(a) that the operation not pose an undue hazard to nonparticipating persons if there is a power failure. Amazon has revised its Operations Guide and provided that document to the FAA confidentially.

In its petition Amazon identifies safety mitigations that justify the minimum 200 ft. requested separation distance. Accordingly, the Coalition supports Amazon's petition for exemption.

Respectfully submitted,



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