

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

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**IN THE MATTER OF**

**Petition of Trumbull Unmanned LLC for Amendment to Exemption No. 11146**

**Docket Number: FAA-2014-0890**

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**COMMENTS OF THE SMALL UAV COALITION**

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May 17, 2016

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**Introduction**

The Small UAV Coalition<sup>1</sup> is pleased to provide its comments in support of the petition by Trumbull Unmanned LLC (“Trumbull”) for an amendment to Exemption No. 11146 to permit Trumbull to operate its small unmanned aircraft from a moving vehicle.

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 Trumbull in its petition for amendment.

In comments the Coalition filed in response to the FAA’s small UAS (“sUAS”) proposed rule, 80 Fed. Reg. 9544 (Feb. 23, 2015), we urged the FAA to allow operations from moving vehicles with appropriate safeguards. Operating a small UAV in place of a helicopter provides a significant increase in safety for all persons on the set. Operations from a moving vehicle may be safely conducted where the operator of the motor vehicle or water vessel is not also the operator of the sUAS.

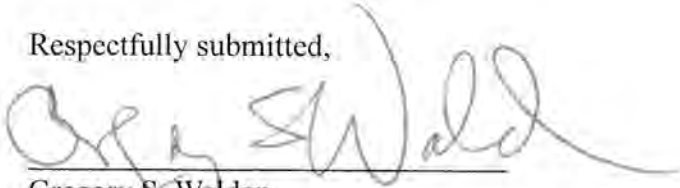
Trumbull’s petition notes its experience operating UAVs from moving vehicles for the Department of Defense and in commercial operations in other countries. While we are not privy to this experience, we trust that this experience and the protocols Trumbull has followed adequately address any safety risks poses by operations from a moving platform.

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<sup>1</sup> Members of the Small UAV Coalition include AGI, AirMap, Amazon Prime Air, Botlink, Flirtey, Google[x] Project Wing, Intel, Kespry, PrecisionHawk, Strat-Aero, T-Mobile, Verizon Ventures, Walmart, and Zero Tech.

The Coalition supports the requested relief.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Gregory S. Walden". The signature is written in a cursive style with a long horizontal flourish extending to the right.

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