

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

IN THE MATTER OF

Petition of AeroLogix Consulting Inc. for Amendment to Exemption No. 11370

Docket Number: FAA-2015-0094

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 AeroLogix Consulting Inc. (“AeroLogix”) for an amendment to Exemption No. 11370 to operate its fixed-wing small unmanned aircraft system (“sUAS”) closer than 500 feet from nonparticipating structures but only during takeoffs and landings to conduct mapping and survey operations.²

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 AeroLogix in its petition for an amended exemption.³

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

² In a letter dated May 2, 2016 the Coalition submitted comments in support of AeroLogix’s petition to operate its sUAS up to 600 feet AGL. These comments respond to the FAA’s request for comments on AeroLogix’s two other requests for relief from the standard conditions and limitations. 81 Fed.Reg. 35812 (June 3, 2016).

³ AeroLogix has clarified that it will operate over private property without obtaining permission from the landowner only between 500 and 600 feet AGL as permitted in 14 C.F.R. 91.119(c), and will comply with the FAA’s standard condition and limitation when operating below 500 feet AGL. The Coalition previously supported petitioner’s request to operate up to 600 feet AGL and thus agrees that the FAA’s condition requiring petitioner to obtain permission from each landowner before flight should be limited to operations under 500 feet AGL. The Coalition notes that in the FAA’s final sUAS rule, operations to inspect a structure will be permitted above 400 ft AGL so long as they are no higher than 400 ft above the structure and within 400 feet laterally. See 14 C.F.R. 107.51(b).

While AeroLogix does not explain the horizontal distance it will keep during takeoffs and landings from nonparticipating persons or property, or the measures it will take to ensure the safety of persons on the ground, AeroLogix has been safely operating its GeoStar UAS up to 600 feet AGL since 2014 under authority of a Certificate of Authorization ("COA") the FAA issued to Le Sueur County, Minnesota. The Coalition also notes that since AeroLogix obtained its exemption, the FAA has revised its standard condition and limitation addressing horizontal distance from nonparticipating persons and structures.

Accordingly, the Coalition supports AeroLogix's petition for an amendment to Exemption No. 11370 to allow operations closer than 500 feet horizontally from nonparticipating persons or structures during takeoffs and landings, upon a suitable showing that such operations will be conducted safely.

Respectfully submitted,



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