



**SMALL UAV
COALITION**
*A Partnership for
Safety & Innovation*

November 14, 2016

Honorable Michael Huerta
Administrator
Federal Aviation Administration
800 Independence Avenue SW
Washington, DC 20591

Re: Request for Information: Notification and Authorization/Information Sharing

Dear Administrator Huerta:

The FAA on September 22, 2016 issued a Request for Information (“RFI”) entitled “FAA UAS Notification and Authorization RFI – Information Sharing Strategies and Demonstrations for Small UAS Operations.” Interested parties were required to respond by October 4, 2016, and we understand that nearly 50 entities responded to the RFI. The Small UAV Coalition is writing this letter to support the use of the RFI process to enlist industry in a partnership to address important and urgent UAS integration issues, including authorizations to operate in controlled airspace, remote identification of UAV operators, and to outline its recommendations for the establishment and implementation of a multivendor unmanned air traffic management system (UTM).

The Small UAV Coalition supports the objectives of this RFI

The Coalition fully embraces the FAA’s explanation of its general approach on page 1 of the RFI:

FAA seeks to ensure reduced barriers to access [to the National Airspace System] and to avoid monopolization of public resources. The FAA challenge is to foster equitable access for all users and providers while ensuring critical air traffic control (ATC) technical and safety requirements are met for NAS operations. In addition FAA seeks to foster a competitive environment for providers of UAS and related services.

While we support the FAA’s initial focus on the safe and efficient integration of small UAS into the NAS, we also continue to strongly urge the FAA to focus in the near term on developing a low altitude airspace UTM.

The stated reason for the RFI is the FAA’s recognition that information sharing among the FAA and UAS operators is a critical element to the automation technologies that will necessarily be part of the integration of UAS operations into the NAS. The FAA points out two objectives that have not yet been met:

[T]here is no comprehensive strategy for identifying and inserting technological capabilities into FAA systems that would enable safe sUAS operation in accordance with established FAA rules

[T]here are no conventions or standards for exchanging information between FAA and external entities about sUAS operations using automated techniques and standards.

RFI, at page 2. Another stated objective is “to develop practical demonstrations of data sharing techniques for Notification and Authorization (N&A)” *Id.*

Responses to the RFI will assist the FAA in implementing Part 107 and meeting recent legislative requirements

1. Part 107 ATC authorization process to permit operations in controlled airspace

This RFI comes against the backdrop of Part 107 and provisions in the FAA Extension, Safety, and Security Act of 2016, Pub. Law No. 114-190 (“Extension Act”). In particular, the FAA pledged in the preamble to the final rule to set up an online portal through which UAS operators would request Air Traffic Control (“ATC”) authorization to operate in controlled airspace. At the present time, applicants complete and submit a form online (which also serves as the form to request a waiver under Part 107), at which point the FAA processes the request. Hence, we believe that respondents to the RFI can assist the FAA in setting up this notice and authorization process established in Part 107.

2. Unmanned traffic management research plan and pilot program

Section 2209 of the Extension Act requires the FAA to initiate development of a research plan for unmanned aircraft systems traffic management (“UTM”) by September 16, 2016 and complete the plan, submit it to Congress, and publish it on the FAA’s website by mid-January 2017. Section 2208 also requires the FAA to establish a UTM pilot program by mid-April 2017. We believe that respondents to the RFI will assist the FAA in development of a notification and authorization process that will operate within a UTM system. Several UTM system designs contemplate that operators within the UTM would be required to provide notification to the UTM service provider of the operator’s identity, location, and intended operation, and that the UTM service provider would be able to authenticate that operator (as contrasted with authorizing the operation).

3. Remote identification standards

Section 2202 of the Extension Act requires FAA to work with other Federal entities and industry stakeholders to develop consensus standards for the remote identification of UAV and UAS operators and owners. By July 15, 2017, the FAA must report to Congress on any standards developed by that time, and by July 15, 2018, the FAA shall issue regulations or guidance, as appropriate, based on these standards. We believe that respondents to the RFI will assist the FAA in the development of these standards.

Principles to guide the FAA in developing the N&A process and information sharing among FAA and UAS operators

Generally speaking, information sharing strategies must be automated, interoperable, scalable, and secure. The primary objective in any N&A process or UTM system is safety, both in terms of persons on the ground and aircraft in the air. Each component must be evaluated to ensure that any increased risk is adequately eliminated or mitigated.

The Coalition supports fully automated interoperable systems that have integrity with regard to both the ability to verify the operator and security measures to guard against mischief or plain negligence. To the greatest practical extent, a UTM should not require the management of humans. The system should be scalable to accommodate the future scope and extent of airspace management needs.

The N&A strategies must address operations permitted in Part 107 by waiver, such as operations at night, beyond visual line of sight, in controlled airspace, and involving multiple vehicles per operator.

Principles to guide the relationship between FAA and industry in setting up and implementing a UTM system

The Small UAV Coalition envisions that the UTM system would not be operated by FAA, but by service providers selected by FAA pursuant to FAA requirements and overseen by FAA. UTM designs have been developed under the auspices of NASA, and such designs ultimately will be subject to approval by FAA.

For the research plan, FAA should follow the policy in 14 C.F.R. 12.101.¹

For the pilot program, UTM service providers could be solicited by the government using Part 12 via full purchase or subscription, or through Cooperative Research and Development Agreements (CRADA). The Coalition supports the FAA's decision to select up to eight respondents to participate in these activities. Early evaluation will speed development efforts and ensure products are developed to FAA specifications. The FAA should enable UTM developers with access to all data necessary and collaborate with industry to develop requirements.

Thank you for your consideration.

¹ 12.101 Policy.

Agencies shall—

(a) Conduct market research to determine whether commercial items or nondevelopmental items are available that could meet the agency's requirements;

(b) Acquire commercial items or nondevelopmental items when they are available to meet the needs of the agency; and

(c) Require prime contractors and subcontractors at all tiers to incorporate, to the maximum extent practicable, commercial items or nondevelopmental items as components of items supplied to the agency.

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Sincerely,



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