

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

IN THE MATTER OF

Petition of Leading Edge Associates, Inc. for Exemption

Docket Number: FAA-2016-9422

COMMENTS OF THE SMALL UAV COALITION

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December 19, 2016

Filed with www.regulations.gov

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Introduction

The Small UAV Coalition¹ is pleased to provide its comments in support of the petition by Leading Edge Associates, Inc. (“Leading Edge”) for an exemption to operate the Yamaha RMAX unmanned aircraft system (“UAS”), which weighs 141 pounds and can weigh up to 202 pounds including payload, for the purposes of aerial agricultural-related operations.

UAS offer a safe and efficient means of conducting precision agriculture operations that can mitigate loss of valuable yield. For example, UAS can help detect and respond to problems caused by insects, drainage, disease, and other threats to crops and livestock. Members of the Small UAV Coalition share an interest in advancing regulatory and policy changes that will permit the operation of UAS in the near term, within and beyond the line of sight, with varying degrees of autonomy, for commercial, civil, 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 Leading Edge in its petition.

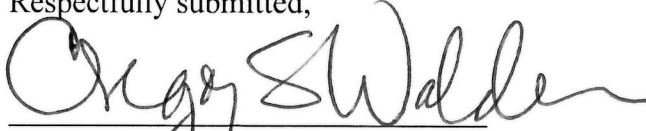
Last year the FAA granted Exemption No. 11488 to Yamaha Motor Corporation, U.S.A. to operate the RMAX UAS to conduct agricultural operations, subject to the standard conditions and limitations and special conditions related to the weight of the UAS (e.g., limiting the speed of the UAV to 45 mph). The Coalition supports Leading Edge’s petition to operate the Yamaha RMAX UAS, in consideration of the FAA’s standard conditions and limitations, which mitigate safety risks to persons and property, and on the assumption that FAA may impose one or more

¹ Members of the Small UAV Coalition include AirMap, AGI, Amazon Prime Air, Flirtey, Fresh Air Educators, Google[x] Project Wing, Intel, Kespri, PrecisionHawk, T-Mobile, Verizon Ventures, and Walmart.

additional conditions, as it did in Exemption No. 11488, if necessary to mitigate any increase in risk due to the weight of the UAS.²

Accordingly, the Coalition supports Leading Edge's petition for exemption.

Respectfully submitted,

A handwritten signature in black ink that reads "Gregory S. Walden". The signature is written in a cursive style with a large initial "G".

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² The Coalition previously filed comments in both FAA Docket 2015-0323 in support of AGERpoint, Inc.'s petition and FAA Docket 2015-5644 in support of Martin UAV's petition. Both companies sought to operate a UAS weighing over 55 pounds.