

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

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**IN THE MATTER OF**

**Petition of Minnesota Department of Natural Resources for Exemption**

**Docket Number: FAA-2016-9414**

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**COMMENTS OF THE SMALL UAV COALITION**

Gregory S. Walden  
Akin Gump Strauss Hauer & Feld LLP  
1333 New Hampshire Ave, N.W.  
Washington, D.C. 20036  
(202) 887-4000  
*Counsel to the Small UAV Coalition*

April 13, 2017

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**Introduction**

The Small UAV Coalition<sup>1</sup> is pleased to provide its comments in support of the petition by the Minnesota Department of Natural Resources (“MNDNR”) on behalf of its Division of Forestry for an exemption to use contracted unmanned aircraft to carry external loads over congested areas to assist firefighting missions without have to submit a plan for FAA approval before each operation. MNDNR explains that wildfires can and do occur in congested metropolitan areas due to the remoteness of certain cities in northern Minnesota, and that many such wildfires begin without warning, and thus time is of the essence.

The Coalition supports MNDNR’s petition to engage companies by contract operate UAV carrying external loads in support of wildfire suppression, without having to file a plan and obtain FAA approval before each operation. MNDNR has set forth a number of risk mitigation measures in its petition; FAA may wish to require additional conditions or limitations to ensure the safety of these emergency operations. The Coalition believes that it is in the public interest to grant exemptions to authorize the use of UAS to suppress wildfire, and granting such exemptions would be consistent with the congressional directive in section 2207 of the FAA Extension, Safety, and Security Act of 2016 that FAA facilitate emergency response exemptions. That section contemplates the FAA waiving certain operating restrictions consistent with the public interest and safety.

Accordingly, the Coalition supports MNDNR’s petition for exemption.

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

Respectfully submitted,

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

Gregory S. Walden  
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Washington, D.C. 20036  
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