



SMALL UAV
COALITION
*A Partnership for
Safety & Innovation*

March 6, 2018

Honorable John Thune
Chairman
Senate Commerce, Science, and
Transportation Committee
512 Hart Senate Office Building
Washington, DC 20510

Honorable Bill Shuster
Chairman
House Transportation and Infrastructure
Committee
2165 Rayburn House Office Building
Washington, DC 20515

Honorable Bill Nelson
Ranking Member
Senate Commerce, Science, and
Transportation Committee
427 Hart Senate Office Building
Washington, DC 20510

Honorable Peter DeFazio
Ranking Member
House Transportation and Infrastructure
Committee
2164 Rayburn House Office Building
Washington, DC 20515

Dear Chairmen Thune and Shuster and Ranking Members Nelson and DeFazio:

The Small UAV Coalition¹ has long called for long-term FAA reauthorization legislation through which Congress can support the development of a forward-leaning regulatory framework that will ensure both the continued growth of the commercial unmanned aerial systems (UAS) industry and the safety and security of our national airspace. FAA reauthorization bills pending before both the House and the Senate include robust UAS subtitles with many initiatives strongly supported by industry. However, the Coalition asks that you include in an upcoming short-term extension a time-sensitive provision to reform Section 336 of the FAA Modernization and Reform Act of 2012 to enable the FAA to require all UAS operators who are required to register with the FAA to be equipped with remote identification and tracking capabilities.

As the Coalition recently wrote to FAA Acting Administrator Dan Elwell, a fully developed UAS regulatory framework – one that will enable safe, routine low altitude operations beyond the visual line of sight and autonomously – will be out of reach in the United States until standards for remote identification and tracking of UAS are in place. Building on the work of the UAS Identification and Tracking Aviation Rulemaking Committee, the FAA is preparing such a rulemaking, but it must first be enabled to require all UAS operators who are required to register with the FAA to abide by such requirements.

As you know, Section 336 precludes the FAA from regulating model aircraft, to include recreational UAS. Under this premise, a Court of Appeals recently vacated the FAA's requirement for recreational UAS to be registered with the FAA. The Coalition appreciates Congress reinstating this important accountability mechanism in the FY18 National Defense Authorization Act, but believes that any effort to require recreational UAS to be

¹ Small UAV Coalition members include Amazon Prime Air, Google [X] Project Wing, Intel, Kespry, PrecisionHawk, Verizon, AGI, Airmap, Flirtey, Fresh Air Educators, T-Mobile, and Walmart.

equipped with remote identification and tracking will face the same challenge unless Section 336 is repealed or reformed. Key stakeholders in both the manned and unmanned aviation sectors share this opinion.

Remote identification and tracking requirements are not simply a prerequisite to enabling the FAA to move forward with rulemakings to allow operations over people, beyond the visual line of sight, and other expanded operations, but also a solution to safety, security, and privacy concerns. The Coalition believes these concerns will not be fully addressed – nor will the law enforcement be satisfied – if a large segment of UAS operations is exempt.

For these reasons, we strongly urge you to include a provision in the upcoming extension of FAA authorities to address this issue so that the FAA can move forward with a remote identification and tracking rulemaking that will ensure both the continued growth of this promising industry and the safety and security of our skies. The Coalition stands ready to work with you in support of this effort.

Sincerely,



CC:

Senate Majority Leader Mitch McConnell

Speaker Paul Ryan

Senate Democratic Leader Chuck Schumer

House Democratic Leader Nancy Pelosi