

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

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IN THE MATTER OF

Petition of General Atomics Aeronautical Systems, Inc. for Exemption

Docket No. FAA-2019-0091

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**COMMENTS OF THE SMALL UAV COALITION**

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The Small UAV Coalition<sup>1</sup> is pleased to provide its comments in support of the petition by General Atomics Aeronautical Systems, Inc. (“General Atomics”) for an exemption from 14 C.F.R. §21.185(b), which states that an applicant for restricted category airworthiness certificate is entitled to such certificate for an aircraft that was either a military surplus aircraft or previously type certificated in another category. General Atomics is seeking type certification for its MQ-9A Reaper, a large aircraft capable of operating more than 25 hours at a time, so that it can be used to inspect railroad lines, pipelines, and other critical infrastructure. General Atomics seeks an exemption because there are no Reapers currently surplus in the military.

Unmanned aircraft systems (UAS) offer a safe and efficient means of conducting a variety of operations. Members of the Small UAV Coalition share an interest in advancing rulemaking, certification, and policy changes that will permit in the near term the operation of UAS, including large UAS, within and beyond the line of sight, with varying degrees of autonomy, for commercial and other civil purposes. The Coalition believes that granting this petition will help advance this objective.

In support of its petition, General Atomics states that the Reaper has been operated for ten years with over two million flights and over 20,000 hours without mishap. The Reaper for which General Atomics will seek type certification has been operating safely in an almost identical manner in the experimental category, for which no compensation is permitted. The Reaper is the same design and manufacture as the Air Force model, and will be maintained under the same Air Force maintenance and inspection program using FAA-certificated A&P mechanics. Any safety mitigations that may be needed in particular operational environments will be spelled out in the type certificate and any certificate of waiver or authorization that is issued.

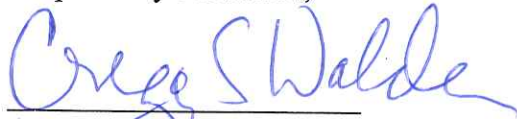
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<sup>1</sup> Members of the Small UAV Coalition are listed at [www.smalluavcoalition.org](http://www.smalluavcoalition.org).

Inspecting critical infrastructure has been a major focus of Congress in enacting UAS provisions (see sections 2209 and 2210 in the FAA Extension, Safety, and Security Act of 2016). The Coalition agrees with General Atomics that its type certification may serve as a template for other large UAS certification.

Accordingly, the Coalition supports General Atomics' petition for exemption.

Respectfully submitted,



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