

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

IN THE MATTER OF

Petition of Bell Helicopter Textron Inc. for Exemption

Docket No. FAA-2019-0270

COMMENTS OF THE SMALL UAV COALITION

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The Small UAV Coalition¹ is pleased to provide its comments in support of the petition by Bell Helicopter Textron Inc. (“Bell”) for an exemption to operate its APT70 unmanned aircraft system (“UAS”) for research and development purposes. The APT70 is a vertical takeoff and landing (“VTOL”) UAS weighing 320 lbs. that holds an experimental category airworthiness certificate. This is the same UAS model for which Bell is seeking an exemption to operate beyond the visual line of sight (“BVLOS”) and up to altitudes of 1,200 feet above ground level (“AGL”) in FAA-2019-0104, which the Coalition supported in comments submitted in May.

In this petition, Bell will operate primarily below 400 feet AGL, within the visual line of sight, over unpopulated areas in which the UAS will maintain lateral separation equal or greater than the altitude AGL and not less than 500 feet from structures and non-participating people.

Unmanned aircraft systems offer a safe and efficient means of conducting a variety of operations. 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 and other civil purposes. This includes operations of UAS over 55 lbs. and operations over 400 feet AGL.

Bell’s pilots will hold a private pilot certificate, which FAA has previously approved for operation under section 333 of the FAA Modernization of 2012 and the Coalition urges the FAA to approve such pilot certificates under the new section 49 U.S.C. 44807, which repealed section 333.

¹ Members of the Small UAV Coalition are listed at www.smalluavcoalition.org.

Bell will employ a redundant command and control (“C2”) system operating on a different frequency than the primary C2 link. It will use Visual Observes and a Ground-Based Detect and Avoid (GBDAA) system that will inform the remote pilot of any aircraft in the area.

For the reasons stated above and in Bell’s petition, Bell has made a strong case that its R&D operations in an unpopulated area in Class G airspace will be conducted safely. Accordingly, the Coalition requests the FAA to grant Bell’s petition for exemption.

Respectfully submitted,



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