

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

IN THE MATTER OF

Petition of Aurora Flight Sciences for Exemption

Docket No. FAA-2019-0172

COMMENTS OF THE SMALL UAV COALITION

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September 3, 2019

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The Small UAV Coalition¹ is pleased to provide comments in support of the petition by Aurora Flight Sciences Corporation (“Aurora”) for an exemption from 14 C.F.R. 133.19(a)(1) and (3) to conduct autonomous external load operations using a Bell UH-1H helicopter for research and development purposes under an Experimental Category Airworthiness Certificate. Aurora will explore the use of unmanned rotorcraft to improve the safety of external load operations in situations like firefighting, and to reduce exposure of military personnel to the risk of an Improvised Explosive Device (IED) as part of the Cooperative UAS and Robots for Remote EOD project under the Naval Air Systems Command.

Members of the Small UAV Coalition support advancing regulatory and policy changes to permit UAS operations beyond visual line of sight (“BVLOS”), with varying degrees of autonomy, for commercial and other civil purposes, including operations of UAS over the weight limit of Part 107.

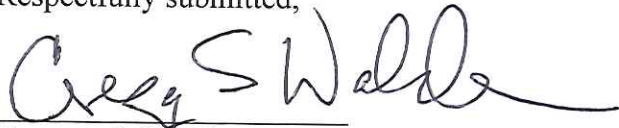
Part 107 does not prohibit external load operations, primarily because of the lower risk posed by a UAS not exceeding 55 lbs. with payload. Part 107 does require the external load to be secure and not adversely affect the flight characteristics or controllability of the UAS. 14 C.F.R. 107.49(e). See also 81 Fed. Reg. 42064, at 42139-42142 (June 28, 2016)(preamble to final rule).

While the Bell UH-1H is not a small UAS subject to Part 107, the entire UAS industry will benefit from research and development of autonomous external load operations. Autonomous technologies suitable for large UAS may also be suitable for small UAS; safe and reliable external load operations using the Bell UH-1H rotorcraft will provide relevant lessons for similar external load operations using small UAS.

¹ Members of the Small UAV Coalition may be found on the Coalition’s website: www.smalluavcoalition.org

Accordingly, the Coalition supports granting Aurora's petition.

Respectfully submitted,

A handwritten signature in black ink that reads "Greg S Walden". The signature is written in a cursive style with a horizontal line underneath the name.

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