

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

IN THE MATTER OF

Petition of HUVRData, LLC for Amendment to Exemption No. 11268

Docket Number: FAA-2014-0942

COMMENTS OF THE SMALL UAV COALITION

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Introduction

The Small UAV Coalition¹ is pleased to provide its comments in support of the petition submitted by John McGraw of Aerospace Consulting on behalf of HUVRData, LLC, for an amendment to Exemption No. 11268 to permit HUVRData to operate the Ascending Technologies Falcon 8 UAV above 400 feet AGL, with approval from the FAA for any operation in or near a populated area, to conduct inspections of electrical towers, flare stacks, and wind farms, among other purposes.

Members of the Small UAV Coalition share an interest in advancing regulatory and policy changes that will permit the operation of small UAVs in the near term, within and beyond the line of sight, with varying degrees of autonomy, for commercial, consumer, recreational and philanthropic purposes.

We applaud the Federal Aviation Administration (“FAA”) for recently accelerating the pace of exemptions, although the Coalition believes there are additional steps the FAA can take to broaden the authority to conduct commercial operations. In particular, we believe the FAA has the authority and the discretion to permit small UAS operations above 400 feet AGL under the circumstances proposed in this petition, and should therefore grant this petition.

¹ Members of the Small UAV Coalition include 3D Robotics, AirMap, AGI, Amazon Prime Air, Botlink, DJI Innovations, Drone Deploy, Flirtey, Google[x] Project Wing, GoPro, Intel, Kespry, Parrot, PrecisionHawk, Strat-Aero, Verizon Ventures, and Zero Tech.

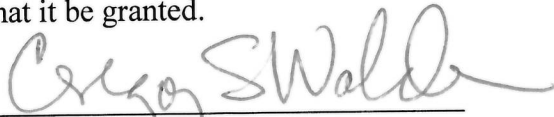
In its August 19, 2015 letter responding to questions from the FAA, HUVRData explained the measures it will take to ensure visual line of sight is maintained with the UAV as it climbs above the structure to be inspected.

HUVRData will set the altitude setting so that the UAV will not climb higher than 50 feet above the structure, and HUVRData will use one or more observers to maintain constant visual line of sight. The Coalition does not believe it is necessary for the Pilot in Command to maintain that visual line of sight provided one or more observe, who are in communication with the PIC, do. In remote areas, it will ensure the protection of any person on the ground by establishing a 500 ft. radius around the structure and provide barriers or structures to protect persons on the ground.

In populated areas, HUVRData will place traffic cones at 50 feet from the 500 ft. radius and signage at the 500 ft. perimeter that reads "DO NOT CROSS THESE LINES. . . ." It will attempt to notify relevant property owners or managers. And it will seek FAA approval.

We believe these safeguards are more than adequate to ensure the safety of HUVRData's operations over 400 ft. AGL within 50 feet vertical from the structure to be inspected.

Accordingly, the Small UAV Coalition strongly supports HUVRData's petition and recommends that it be granted.



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