

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

IN THE MATTER OF

Petition of Hazon Solutions LLC for Amendment to Exemption No. 11442

Docket Number: FAA-2015-0218

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 submitted by Hazon Solutions LLC (“Hazon”) for an amendment to Exemption No. 11442 to permit Hazon to operate its sUAS rotorcraft to conduct infrastructure inspections as close as 20 feet horizontally to such infrastructure, but not over persons not involved in the sUAS operations.

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 accelerating the pace of exemptions. The Coalition believes there are additional steps the FAA can take to broaden the authority to conduct commercial operations. In particular, the FAA has the authority and the discretion to permit small UAS operations as close to 20 feet of structures under the circumstances proposed in this petition for amendment, and should therefore grant this petition to revise standard condition 26 as requested.

The FAA recently granted exemption authority to conduct operations closer than 500 feet from persons not involved in the UAS operation. See Exemption No. 13465 (undated) to Kansas State University, Docket No. FAA-2014-1088. The FAA stated, at page 10, that a UAV may be operated “over or near people who are not essential flight personnel but are essential for the intended purpose of the operation]” We assume the persons who will be closer to Hazon’s

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, Kespriy, Parrot, PrecisionHawk, Strat-Aero, Verizon Ventures, and Zero Tech.

sUAS operations will be part of its inspection operations and will be on notice of the sUAS operations and thus should be regarded as “essential for the intended purpose of the operation.”

Hazon notes that standard condition 26 is more onerous than what is required in 14 C.F.R. §91.19(d) for manned helicopters (operations permitted if conducted without hazard to persons or property on the surface), and believes that sUAS operations should be subject to the same standard. The Coalition agrees.

Hazon emphasizes that its sUAS will not be operated over persons not participating in the sUAS operation unless they are under a covered structure. While not specifically requested, the Coalition believes that Hazon should be authorized to conduct its inspection operations closer than 500 feet from non-participating personnel. The three conditions the FAA lists in Exemption No. 13465 for operations closer than 500 feet from these participants are: (1) the operator must brief the participants and obtain their consent; (2) the operator must have an operations manual that addresses the safety risks posed by such operations; and (3) the operator must file a plan of activities with the local Flight Standards District Office at least 24 hours before initiating operations. We assume Hazon’s policies and procedures (submitted confidentially to the FAA) meet these conditions and are more than adequate to ensure the safety of Hazon’s proposed operations within 500 feet of persons who are not part of the sUAS operation and as close as 20 feet to a structure the sUAS is inspecting.

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



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