

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

IN THE MATTER OF

Petition of M3 Consulting Group LLC for Exemption

Docket Number: FAA-2015-4248

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 by M3 Consulting Group LLC (“M3”) for an exemption to permit M3 to operate its small unmanned aircraft system (“sUAS”) for insect control closer than 5 miles to certain airports in rural areas, specifically: no closer than 3 nautical miles (“NM”) from a non-towered airport with a published instrument flight procedure; no closer than 2 NM from a non-towered airport without a published instrument procedure; and no closer than 2 NM from a heliport with a published instrument procedure.

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 grant the relief requested by M3.

The FAA’s standard condition in a section 333 exemption allows operations closer than 5 miles to an airport if the operator obtains a letter of agreement with the airport operator or the operations are permitted in the operator’s Certificate of Authorization (“COA”). Although M3’s petition does not state whether it will comply with this condition, we believe that sUAS operations may be conducted safely in Class G airspace and in VMC conditions, without interference with airport operations or air navigation, at the distances M3 proposes to keep and

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, T-Mobile, Verizon Ventures, and Zero Tech.

the low altitude (below 200 feet AGL) at which M3 will conduct its insect control operations, given the low activity at non-towered airports and the nature of departure and arrival paths for manned helicopters.

Accordingly, the Coalition supports M3's petition for exemption.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Gregory S. Walden". The signature is written in black ink and is positioned above a horizontal line.

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