

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

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**IN THE MATTER OF**

**Petition of AeroLogix Consulting Inc. for Amendment to Exemption No. 11370**

**Docket Number: FAA-2015-0094**

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**COMMENTS OF THE SMALL UAV COALITION**

Gregory S. Walden  
Akin Gump Strauss Hauer & Feld LLP  
1333 New Hampshire Ave, N.W.  
Washington, D.C. 20036  
(202) 887-4000  
*Counsel to the Small UAV Coalition*

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**Introduction**

The Small UAV Coalition<sup>1</sup> is pleased to provide its comments in support of the petition by AeroLogix Consulting Inc. (“AeroLogix”) for an amendment to Exemption No. 11370 to operate its fixed-wing small unmanned aircraft system (“sUAS”) up to 600 feet AGL to conduct mapping and survey 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. 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 AeroLogix in its petition for an amended exemption.

AeroLogix has been safely operating its GeoStar UAS up to 600 feet AGL under authority of a Certificate of Authorization (“COA”) the FAA issued to Le Sueur County, Minnesota. AeroLogix explains that conducting mapping and survey operations of both public and private property is not practical if it must seek approval from each private property owner or it is prohibited from operating over non-participating persons. AeroLogix asserts that operating above 500 feet AGL, coupled with the technological capabilities of its UAS models, issuance of NOTAMS, can be conducted without risk of persons and property below. The Coalition agrees, and notes that AeroLogix has been operating safely under the Le Sueur County COA safety at altitudes up to 600 feet.

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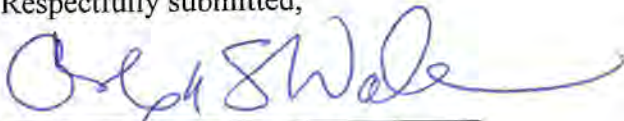
<sup>1</sup> Members of the Small UAV Coalition include AirMap, AGI, Amazon Prime Air, Botlink, Flirtey, Google[x] Project Wing, Intel, Kespri, PrecisionHawk, Strat-Aero, T-Mobile, Verizon Ventures, Walmart, and Zero Tech.

The Coalition supports AeroLogix's request to conduct operations over public property and over persons not involved in the sUAS operation with a vertical clearance of at least 500 feet. In Coalition comments on the FAA's sUAS proposed rule, we urged the FAA to allow small UAV operations over non-involved persons with appropriate conditions and limitations, noting that without such permission many UAS use cases would not be practical. As a result, such operations would continue to operate manned helicopters, increasing the safety risks to persons on the ground as well as to helicopter operators.

AeroLogix proposes to operate up to 600 feet only in Class G and E airspace, except where it obtains Air Traffic Control approval to operate in Class C or D airspace. The standard COA provides additional protection by mandating a certain distance from towered and non-towered airports.

Accordingly, the Coalition supports AeroLogix's petition for an amendment to Exemption No. 11370.

Respectfully submitted,



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(202) 887-4000  
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