

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

IN THE MATTER OF

Petition of AgrowSoft, LLC dba AgrowDrone for Exemption

Docket Number: FAA-2016-9427

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 AgrowSoft, LLC d/b/a AgrowDrone (“AgrowDrone”) for an exemption to operate a remotely-piloted helicopter with a maximum payload weight of 42 pounds to provide commercial agriculture-related services, including agricultural spraying and monitoring, in the United States.

Unmanned Aircraft Systems (UAS) offer a safe and efficient means of conducting precision agriculture operations that can mitigate loss of valuable yield. For example, UAS can help detect and respond to problems caused by insects, drainage, disease, and other threats to crops and livestock. Members of the Small UAV Coalition share an interest in advancing regulatory and policy changes that will permit the operation of UAS in the near term, within and beyond the line of sight, with varying degrees of autonomy, for commercial, civil, 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 AgrowDrone in its petition.

AgrowDrone seeks to “carry pesticides, fungicides, and fertilizers on the remotely-piloted helicopter which are considered hazardous materials.”² The company is seeking an exemption from several provisions of Part 137 that are in all material respects similar to provisions in Part 91 for which FAA has granted over 5,000 exemptions. The Coalition supports AgrowDrone’s petition, in consideration of the FAA’s standard conditions and limitations, which mitigate safety risks to persons and property.

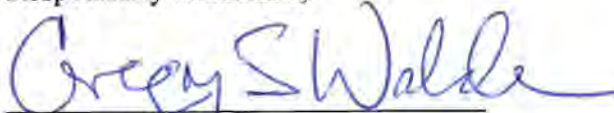
¹ Members of the Small UAV Coalition include AirMap, AGI, Amazon Prime Air, Flirtey, Fresh Air Educators, Google[x] Project Wing, Intel, Kespry, PrecisionHawk, T-Mobile, Verizon Ventures, and Walmart.

² The company seeks an exemption from 14 C.F.R. 107.36, but relief from a provision of Part 107 must be pursued under the waiver provisions of Part 107, not section 333.

AgrowDrone also seeks to use a pilot who has obtained a remote pilot certificate with a small UAS rating under Part 107 without having obtained at least a private pilot certificate under Part 61. AgrowDrone also states that will apply for an exemption from the requirement in 14 C.F.R. 137(19) that an operation under Part 137 must be conducted by a holder of at least a commercial pilot certificate.³ To our knowledge, all previous section 333 exemptions have required the pilot hold a Part 61 airman certificate. In commenting in support of many section 333 petitions, the Small UAV Coalition argued that section 333 gave the FAA the authority to waive Part 61 or at least the manned flight training requirements of that Part. Now that Part 107 has been promulgated, the Coalition believes that FAA should accept a remote pilot certificate in lieu of a Part 61 airman certificate.

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

Respectfully submitted,



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³ AgrowDrone states that it is also pursuing a Part 137 certificate.