

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

IN THE MATTER OF

Petition of Joby Aviation LLC for Exemption

Docket Number: FAA-2016-5094

COMMENTS OF THE SMALL UAV COALITION

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April 13, 2017

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Introduction

The Small UAV Coalition¹ is pleased to provide its comments in support of the petition by Joby Aviation LLC (“Joby Aviation”) for an exemption to operate the S4-SS with a takeoff weight of 62.5 pounds (+/- five pounds) to perform aeronautical research and development utilizing remotely piloted scale model aircraft. This testing will support efforts to develop the full scale S4, a four seat, 4,000 pound wing tilt-rotor under development in accordance with Joby Aviation’s mission to develop transformative electric and hybrid-electric aircraft designs and technologies. Specifically, S4-SS operations will allow Joby Aviation to test and validate software and hardware features of the S4.


Joby Aviation states that it is working with that NASA on the conventional takeoff and landing LEAPTech/SCEPTOR project exploring distributed electric propulsion concepts.² The Coalition supports Joby Aviation’s petition to operate the S4-SS in support of this research and in consideration of the FAA’s standard conditions and limitations, which mitigate safety risks to persons and property, and on the assumption that FAA may impose one or more additional conditions, as it did in Exemption No. 11488, if necessary to mitigate any increase in risk due to the weight of the UAS, which is only marginally over the limit in Part 107.

Accordingly, the Coalition supports Joby Aviation’s petition for exemption.

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

² <https://www.nasa.gov/centers/armstrong/Features/leaptech.html>

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Greg S. Walden", written over a horizontal line.

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