

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

IN THE MATTER OF

Petition of Overwatch Aero, LLC for Exemption

Docket No. FAA-2018-0857

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 by Overwatch Aero, LLC (OWA) for an exemption to operate the Latitude Engineering HQ-60 and HQ-90 unmanned aircraft weighing more than 55 pounds for search and rescue and fire mapping support to first responders. The maximum gross takeoff weight for the HQ-60 is 95 lbs. and 104 lbs. for the HQ-90.

Unmanned Aircraft Systems (UAS) offer a safe and efficient means of conducting a variety of operations. 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 and other civil purposes. This includes UAS that weigh more than 55 pounds. The Coalition believes that granting this petition will help advance this objective.

The two UAS models are both hybrid quadcopters that will conduct Vertical Takeoffs and Landings (VTOL) with an electric motor and use a gas engine for forward flight. OWA states that it will use the Trillium Orion HD50 and HD80 Electro-optical (EO)/Long Wave Infrared (LWIR) sensor to collect high quality, actionable data for use by firefighters, first responders, and search and rescue personnel. The UAS will carry the Silvus 4200 Streamcaster, a software-defined radio, to support the data backhaul and command and control communications. Its UAS will have an ADS-B Out transponder for communications with ATC, and feature navigation lights and anti-collision lights.

OWA seeks to operate both VLOS and BVLOS operations, the latter within direct line of sight for the command and control link. With respect to the operating environment, OWA will work with

¹ Members of the Small UAV Coalition are listed at www.smalluavcoalition.org.

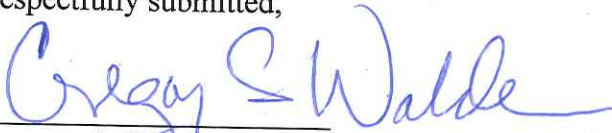
the FAA and the Incident Commanders to establish a Special Government Interest area or Temporary Flight Restriction (TFR), and issue NOTAMS as appropriate. (For training missions, OWA will operate either in a remote rural area or within an area managed by the Bureau of Land Management.) Given these controlled environments, under a TFR and/or under the supervision of an Incident Commander, and given the safety features of these UAS models, the Coalition believes BVLOS operations are both in the public interest and can be conducted safely. The Coalition notes the congressional direction to the FAA in section 2210 of Public Law 114-190 to grant BVLOS authority to operations in response to a natural or manmade disaster or severe weather event that may cause damage to critical infrastructure.

The Coalition also believes that the operational environment, including the needs of firefighters, first responders, and search and rescue personnel, warrants granting OWA's request to conduct UAS operations over 500 ft. AGL and up to 4,000 ft. AGL.

In section 359 of the FAA Reauthorization Act of 2018, Congress directed the FAA to report to Congress, by April 3, 2019, on the use of UAS in support of firefighting and emergency response. Granting this and similar exemption petitions will enable the FAA to gather data from UAS operators for this required report.

In sum, the Small UAV Coalition supports OWA's petition, including its request to operate BVLOS and above 400 ft. AGL, in consideration of the many safety features detailed in its petition and the particular operational environments where the public interest is strongest and safety of aircraft operations is assured under the auspices of a TFR and/or Incident Commander. Accordingly, the Coalition requests the FAA grant OWA's petition for exemption in full.

Respectfully submitted,



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