Small UAV Coalition Files Comments in Response to UAS Regulatory Proceedings
Continues to Call on Department of Transportation to Release Proposal for Remote Identification Standards

WASHINGTON, DC – April 15, 2019 – Today, the Small UAV Coalition filed comments in response to the Federal Aviation Administration (FAA) Notice of Proposed Rulemaking (NPRM) for Operations of Small UAS Over People (OOP) and the Advanced Notice of Proposed Rulemaking (ANPRM) for Safe and Secure Operations of Small UAS. Read the Coalition’s comments here.

While the Coalition has long urged the FAA and the Department of Transportation (DOT) to develop rules to enable expanded commercial operations, the NPRM itself is clear that no such regulations, including the operations over people proposal, will move forward until remote identification standards are in place. Unfortunately, DOT recently again pushed back the expected date of publication for this proposed rule, which is critical to enhancing safety, security, and privacy and unleashing the real potential for increased U.S. innovation in this industry.

The Coalition supports the proposal in the OOP NPRM to allow UAS operations at night subject to equipage and training requirements, thus obviating a waiver. However, the Coalition opposes the kinetic energy limits the FAA proposes in the NPRM as unduly restrictive and failing to consider additional relevant risk factors. The Coalition urges the FAA to use instead the automotive metrics recommended in comments submitted by the Alliance for System Safety of UAS through Research Excellence (ASSURE), the FAA’s Center for Excellence for UAS Research.

The ANPRM does not propose any rulemaking, but it nonetheless suggests that some prescriptive requirements may be added to Part 107 without any apparent evidentiary basis to determine that the operational conditions and limitations in Part 107 are inadequate. Further, it poses questions about an unmanned traffic management (UTM) system while the FAA, NASA, and industry are currently engaged in a congressionally mandated UTM Pilot Program (UPP) that will provide data to inform many of the very questions that the ANPRM poses.

Remote identification is a critical safety and security tool and the Coalition continues to echo members of Congress and representatives of the national security and law enforcement communities in calling on the FAA to publish a proposed rule for remote identification and tracking without further delay.

For more information on the Small UAV Coalition, please visit www.smalluavcoalition.org, contact press@smalluavcoalition.org, or follow @smallUAVs on Twitter.

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