

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

IN THE MATTER OF

Petition of Moog, Inc. for Exemption

Docket No. FAA-2019-0823

COMMENTS OF THE SMALL UAV COALITION

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November 21, 2019

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The Small UAV Coalition¹ is pleased to provide its comments in support of the petition by Moog, Inc. (“Moog”) for an exemption under section 44807 to allow Moog to operate the MACH 2p2 unmanned aircraft system (“UAS”) weighing over 55 lbs., but under 100 lbs., using remote pilots who will hold a remote pilot certificate under Part 107.

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 operations of aircraft heavier than 55 lbs. The Coalition believes that granting this petition will help advance this objective.

Moog’s petition requests permission to use pilots who hold a Part 107 remote pilot certificate instead of a Part 61 airman certificate. Before it published the Part 107 final rule, the FAA required section 333 exemption holders to use only pilots with an airman certificate; the Coalition believes a Part 61 airman certificate is not necessary, in light of the equivalent level of safety involved in the combination of Part 107 certification and training specific to the operations Moog pilots will conduct. The Coalition is pleased that the FAA previously adopted this position in Exemption No. 17936 to DroneSeed Co., FAA-2017-1157 (Aug. 13, 2018), and believes Moog should receive the same relief.

As for operations of UAS over 55 lbs., Moog has obtained an Experimental Category Airworthiness Certificate per FAA Order 8130.34D to permit it to conduct research and development activities. Moog does not disclose what commercial activities it plans to conduct. While the Experimental Special Airworthiness Certificate does not itself authorize commercial

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

operations, the showing Moog made to obtain such a certificate is relevant to the safety of its planned operations. Moog operations will be conducted only during the day, within the visual line of sight of the pilot in command, in Class G airspace, under 400 feet above ground level (“AGL”), and not over people. Other operational limitations are included in materials submitted confidentially.

In sum, the Small UAV Coalition supports Moog’s petition for exemption, in consideration of the safety of its UAS, operating within the parameters of Part 107, and the particular operational environment where UAS operations will be conducted. Accordingly, the Coalition requests the FAA grant Moog’s petition for exemption.

Respectfully submitted,



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