

2012-WSA-71-COA / Avery Action Item: 12-0803-31350-DREY

Application for Certificate of Waiver or Authorization (COA Online)

Issue 1: Operational Summary:

Finding: In this section of the application the proponent states the following:

“... All operations will be conducted in accordance with the USDA-ARS' policy for the use of unmanned aircraft systems, which has been provided in this COA application. In addition, all operations will be conducted in accordance with manufacturer's recommendations and checklists.”

The “USDA-ARS policy for the use of unmanned aircraft systems” referenced in the proponent’s statement is not attached to the application as stated.

Correction: Please have the proponent submit their policy for the use of unmanned aircraft systems and the manufactures recommended operations instructions and checklists for review and consideration.

Issue 2: Performance Characteristics:

Finding: In this section of the application the proponent indicates the “Maximum MSL” is “1000” therefore, I assume this to be the service ceiling of the aircraft. However, this statement conflicts with the “Flight Operations Area/Plan” section of the application wherein the proponent indicates they will be operating their aircraft from 300 feet MSL up to 1,500 feet MSL at the various waypoints reflected in the plan.

I was unable to open/view the attachment to the application describing the “Launch/Recovery” procedures.

Correction: Please have the proponent submit the aircraft operating limitations for review and consideration and correct the altitude conflict. They need to also resubmit the “Launch/Recovery” procedures attachment in a format that can be opened/viewed.

Issue 3: Airworthiness:

Finding: The proponent’s airworthiness statement states “The USDA-ARS has evaluated the Lepton Avenger SUAS and determined that it is airworthy based upon the manufacture’s specifications, maintenance recommendations, and operating procedures”.

FAA policy requires “The applicant **must** provide an airworthiness statement specifying compliance with the **proponent’s applicable airworthiness policy or criteria**”. [Emphasis added]

Correction: Please have the proponent attach a copy of their written policy or criteria, i.e. the USDA’s airworthiness criteria, used to determine the manufactures specifications, maintenance recommendations, and operating procedures met their airworthiness standard. Additionally, please have the proponent attach a copy of their agency’s procedures and guidelines they intend use to maintain continued airworthiness of the aircraft at a level which ensures the aircraft can be operated as required by FAA policy.

Issue 4: Procedures:

Finding: In this section of the application the proponent provided an attachment to describe their “Lost Communications Procedures”. However upon review of the document it only discusses lost communications between the ground station and the aircraft i.e. lost link.

Correction: Please have the proponent describe the procedures it intends to use in the event the pilot experiences lose communication with an ATC facility and/or the ground visual observer.

This is particularly important since the proponent has proposed operating their aircraft at various locations within the surface based Class C airspace associated with the Kahului (Maui) airport. At one location the proposed operation is located approximately eighth tenths of a mile from the approach end of runway 20 and 23.

Issue 5: Visual Surveillance/Detection Capability:

Finding: In this section of the application the proponent indicates they intend to conduct visual observation of the UA from one or more ground sites. However, there is no attachment to the application describing their policy or procedures for using a visual ground observer to comply with section 91.113.

Correction: Please have the proponent attach the policy and procedures they intend to use to comply with the see and avoid aspect of section 91.113.

Issue 6: Flight Operations Area/Plan:

Finding: The map attached to this section of the application can not be opened or viewed.

Correction: Please have the proponent reattach the map attachment in a format that can be opened/viewed.

Issue 7: Flight Crew Qualifications (Pilots):

Finding: In this section of the application titled “Unique Trained Pilot Description” the proponent indicates there is an attachment to the application describing this training; no such attachment could be located.

In the section of the application titled “Currency Status” the proponent states: UDSDA annual medical exam with eye test to Class 2 medical standard”. This section of the application is not related to the pilot’s medical qualification. The section requires the applicant to describe their process for ensuring that the pilots maintain an appropriate level of currency in the UAS being operated.

Correction: Please have the proponent amend the application to contain the required information.

Issue 8: Flight Crew Qualifications (Observers):

Finding: In this section of the application titled “Unique Trained Pilot Description” the proponent indicates there is an attachment to the application describing this training; no such attachment could be located.

The proponent indicates there is an attachment to the “DOD Certified Training Attachment” field of the application, no such attachment is available.

In the section of the application titled “Currency Status” the proponent states: UDSDA annual medical exam with eye test to Class 2 medical standard”. This section of the application is not related to the observer’s medical qualification. The section requires the applicant to describe their process for ensuring that their observers maintain an appropriate level of currency in the UAS being operated.

Correction: Please have the proponent amend the application to provide the required information.

Issue 7: Flight Crew Qualifications (Observers):

Finding: In this section of the application titled “Unique Trained Pilot Description” the proponent indicates there is an attachment to the application describing this training; no such attachment could be located.

In this section of the application titled “DOD Certified Training Attachment” the proponent indicates there is an attachment to the application describing this training; no such attachment could be located.

In the section of the application titled “Currency Status” the proponent states: UDSDA annual medical exam with eye test to Class 2 medical standard”. This section is required to be completed by reflecting the manner in which the proponent intends to keep its observers current and is not related to the observer’s medical qualification.

Correction: Please have the proponent amend the application to contain the required information.