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June 5, 2019

To: FAA Drone Advisory Committee

Re: Two Recreational UAS topics for DAC consideration

Sirs:

The FPV Freedom Coalition (FPVFC) is a nonprofit representing recreational UAS operators in the U.S. Please forward to the DAC to consider integrating these proposals in upcoming We UAS rules and regulations:

- 1) **250 gram limit.** Canada, Europe and for FAA Part 107 holders, the U.S. has adopted UAS' of an All Up Weight of up to 250 grams as a special category due to low mass and low risk of damaging property or injuring people. The FPVFC requests the FAA consider setting a weight category of under 250 grams for recreational UAS which waives all rules and regulations except the FAA Safety Guidelines. The FPVFC has an expanded set of Safety Guidelines tailored to UAS which are being used until the FAA publishes its own.
- 2) **Shielded Operations.** New Zealand has instituted "Shielded Operations", which they have defined to allow the flight of a model aircraft below the top of the tallest natural or man-made object within 100 meters of the current area of operation. Rules relating to controlled airspace are waived for Shielded Operations. The FPVFC proposes the FAA consider adopting a similar regulation to open more airspace to model aircraft hobbyists.

David W. Messina

Statement from Deborah Flint, CEO, Los Angeles World Airports  
Drone Advisory Committee  
June 6, 2019

- I am very sorry that I am unable to attend today's meeting personally, but I have sent key leadership from my team and look forward to engaging with all of you – our new Chair Michael Chasen and both new and continuing members – on the critically important work of this committee.
- The world today looks very different from when the DAC last met 11 months ago.
- We have seen majorly disruptive drone incidents at and around major global airports – most notably at Gatwick, but also at Newark and other U.S. airports.
- We know that a Gatwick-type incident at LAX would be devastating for the local, regional, and national economy.
- It also could grind the public appetite for integration of drones into the National Airspace System to a halt.
- Yet, even after Gatwick and other incidents, the fundamentals for preventing and responding to such incidents are not yet in place.
- This committee has the right people and mandate to tackle these issues and develop specific timeframes, outcomes and clearly defined roles and responsibilities to guarantee the safety and security of our airports.
- Thank you for treating this issue with the urgency it demands.

TO: Drone Advisory Committee  
Date: June 1, 2019  
From: Dean Schober  
Hartford, WI

I have several items I would like to bring to the attention of the committee;

**Item A)**

- 1) As of last month there were 1,391,192 drones registered in the FAA drone database
- 2) 367,773 were commercial/public
- 3) 1,018,208 were to Recreational pilots

Recreational pilots make up 73% of registrations and that's based off 1 aircraft per recreational pilot who only receive one registration number vs. a separate number per aircraft for commercial/public/institutional pilots.

Despite this significant majority of recreational pilots the DAC, which is made up of 33 people, has only one (1) representative from recreational pilots. Manned aircraft pilots have a higher representation (5) and they have nothing to do with drones. Local government representatives have six seats, and I'm not quite sure why the helicopter pilots association needs to representatives on the committee.

I'm asking that the majority of pilots be represented by 50% of the DAC seats. Or that some arrangement is made so the interest and opinions/concerns of actual drone pilots be considered by the DAC before making rules that affect them.

I would like to add that the drone community, recreational and commercial, are interested in safely integrating into the NAS and have no desire to endanger manned flight or interrupt manned air traffic or ATC activity.

We would however, like to see our right to enjoy our hobby without undue regulation. We would request that laws effecting our hobby not be made without a fair and equal representation of pilots and CBO's involved in the hobby.

### **Item B)**

I would also ask that the DAC re-consider the requirement for a spotter when a pilot is flying FPV. I believe a reasonable set of rules allowing for low level flight in areas that are free of significant manned aviation be allowed under the rules.

I base this off several things, first, when a pilot puts on a set of FPV goggles they do not lose their other senses, they can hear people and machines around them and can hear aircraft long before they can be seen. As I type this letter two army black hawk helicopters flew near my house. I immediately went outside and started to look for them. I could hear them several minutes before seeing them pass to the West, moving Southwest at about 1000 feet and about a quarter mile to the West. Had I been flying, goggles on or not, I would have had plenty of time to descend below the treetops and or land before they came into view.

The FPV camera often provides a better image of what is going on around the UAS, where it is located and its proximity to fixed objects as well as what is underneath them. Line of sight to the aircraft is focused on just that, it is more hampered by visibility issues, distance and objects on the ground that prevent seeing what is under the UAS.

As a comparison manned aircraft have limited view from the cockpit of an airplane, the environment is loud and the pilots need to wear headphones to hear radio traffic. Their sight is limited just as an FPV camera is yet there is no requirement for a spotter in general aviation airplanes.



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**DATE:** May 31, 2019

**TO:** Drone Advisory Committee  
Mr. Michael Chasen, Chairman

**SUBJECT:** RTCA Activities Associated with Counter-UAS Technology

As the newly appointed President and CEO of RTCA, Inc., I offer my congratulations to the new members of the FAA's Drone Advisory Committee (DAC) as well as to its new chairman, Mr. Michael Chasen. Although RTCA no longer has a direct role in the activities of the DAC, we continue to applaud the importance and significance of this Federal Advisory Committee to the safety, security, and overall health of the aviation ecosystem.

Based on conversations earlier this year with the FAA Acting Administrator and the Department of Defense, RTCA is in the process of soliciting from industry the need for technical performance standards to support counter-UAS technology. In a joint meeting in our offices last month with FAA, Department of Defense, Department of Justice, Department of Homeland Security, Airports Council-North America, Aerospace Industries Association, and the Air Line Pilots Association, International, it was made clear there is a need for further action on this topic. In the coming months, RTCA will continue to pursue those discussions, including exploring a more formal memorandum of cooperation between the appropriate organizations.

Again, congratulations to the committee. RTCA stands by to support your efforts in addressing both the opportunities and the challenges of UAS development and integration into the airspace system.

Sincerely,

A handwritten signature in black ink, appearing to read 'Terry McVenes', written over a white background.

Terry McVenes  
President and CEO

**From:** [Peter Burke](#)  
**To:** [Peter Burke](#); [Harm, Chris \(FAA\)](#)  
**CC:** [Michael.Chasen@precisionhawk.com](#); [Dan.Elwell@faa.gov](#); [Orquina, Jessica A \(FAA\)](#)  
**Subject:** DAC (drone advisory committee) makeup  
**Date:** Friday, May 17, 2019 6:17:16 PM

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To: FAA Acting Administrator Dan Elwell  
CC: Chris Harm [chris.harm@faa.gov](mailto:chris.harm@faa.gov)  
CC: Jessica Ann Orquina Senior Communications Specialist [Jessica.A.Orquina@faa.gov](mailto:Jessica.A.Orquina@faa.gov)  
CC: Michel Chasen, Chair, DAC, [michel.chasen@precisionhawk.com](mailto:michel.chasen@precisionhawk.com)

Dear Acting Administrator Dan Elwell-

I am a professor of EE at University of California Irvine.  
(I was a nominee to the DAC, which was announced this week.)

I noticed you are a USAFA grad from your profile. My father was a USAFA grad ('70) as was my brother ('96). I have been told the cadets this year are having a great time building and testing drone swarms there; I'd like to go visit. I have always wanted to do something like that at the University of California with my own students, but FAA and university regulations have been so strict that it will probably never happen.

The reason I am emailing to express my strong disappointment with the selected makeup of the "Drone Advisory Committee".

There is not a single university person on the committee. There are 100,000 part 107 pilots but none of them are represented on the committee. Of the 800,000 registered hobbyists, there is only 1 representative on the committee (AMA).

The committee makeup is really skewed against individual operators, and this of course includes students and universities as well as tinkerers in their garage. I am guessing the USAFA cadets have special representation from the USAF allowing them to build and fly drone swarms, but where does that leave civilian students as well as hobbyists on the DAC? Under the bus. This week, for example, in the federal register, the FAA guidelines essentially grounded all student and educational activities at universities in controlled airspace, which must include thousands of students. At UC Irvine in engineering, for example, we have hundreds of engineering students every year build and fly drones. That activity is now grounded with the interim rule. Who is going to stick up for the students, hobbyists, tinkerers, educators, and high level university activities to the FAA on the drone advisory committee?

I'm not sure what the selection process was, but the end results is skewed towards large institutions.

For the sake of the future of aviation in the US, I strongly urge the committee makeup to be revised to better reflect the university constituents, as well as the 800,000 registered hobbyists, rather than focus on big business interests.

Respectfully,  
-Peter Burke

PS-

To Chris Harm & Jessica Ann Orquina, since you coordinated the DAC nominations, can you make sure this email gets to Michael Chasen (DAC Chair) and FAA Acting Administrator Elwell (DAC designate federal officer member)?

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Peter John Burke  
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