

DAC Public Comments
January 1, 2020- December 31, 2020

-----Original Message-----

From: johnandadrianarice@gmail.com <johnandadrianarice@gmail.com>
Sent: Monday, January 06, 2020 3:50 PM
To: Orquina, Jessica A (FAA) <Jessica.A.Orquina@faa.gov>; Kolb, Gary (FAA) <Gary.Kolb@faa.gov>
Subject: Message from www.faa.gov: public comment to the dac

This email was sent through the Federal Aviation Administration's public website. You have been contacted via an email link on the following page:

www.faa.gov/uas/programs_partnerships/drone_advisory_committee/

Message:

I just wanted to ask for the committee to address internet and wifi connectivity in rural areas and a common sense approach. For example, manufacturers required only to allow 400' AGL and 1000' from controller (VLOS). My 13 year old son and I have a drone photography business (Part 107) and will be forced to give up our plan to provide for our families if we are not able to take off. I ask for your consideration of a better plan to keep all concerns addressed.

-----Original Message-----

From: wallyschmidt77@gmail.com <wallyschmidt77@gmail.com>
Sent: Monday, February 17, 2020 12:22 PM
To: Orquina, Jessica A (FAA) <Jessica.A.Orquina@faa.gov>; Kolb, Gary (FAA) <Gary.Kolb@faa.gov>
Subject: Message from www.faa.gov: public comment to the dac

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Message:

I understand the commercial drone industry's interest in controlling the low-altitude airspace, but as an RC modeler, I'm profoundly disappointed that the FAA's approach lumps us all into the same group and makes assumptions that don't mesh in the least with my experience with model aviation. The one-size-fits-all approach seems totally inappropriate, especially to a westerner who realizes that we still have a lot of unpopulated areas which will never be cost-effective for aerial package delivery, etc. Further, model aviation has been an incubator of young aviators. The current NPRM will create yet another disincentive for kids, STEM teachers and the like to use model aviation as a stepping-stone to aviation careers. The FAA can do better.

-----Original Message-----

From: billhodes450@yahoo.com <billhodes450@yahoo.com>
Sent: Monday, February 17, 2020 12:36 PM

To: Orquina, Jessica A (FAA) <Jessica.A.Orquina@faa.gov>; Kolb, Gary (FAA) <Gary.Kolb@faa.gov>
Subject: Message from www.faa.gov: public comment to the dac

This email was sent through the Federal Aviation Administration's public website. You have been contacted via an email link on the following page:

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Message:

The remote ID for recreational model aircraft is totally uncalled for. We have been flying our model aircraft (not drones) for decades with no problems at all. Now you have lumped us in with the people who are causing the problem. The people causing the problems are the ones flying multi rotor drones over the wildfires, over crowded sports arenas and down the streets of major cities. We recreational model aircraft flyers are flying our models at designated club flying sites and are not flying beyond line of sight. Please put your efforts where it will do the most good. Your proposed regulations will serve to kill a hobby that has produced many of NASA's astronauts, many military pilots and many commercial pilots. You will also cause thousands of Americans to lose their employment when you kill this hobby. Please realize that model aircraft (fixed wing and traditional helicopters) and drones (multi rotor machines) are not the same thing, are not operated in the same way and should not be lumped into an ill conceived regulation.

Bill Hodges
Safely flying model aircraft since 1958
Academy of Model Aeronautics #12450

-----Original Message-----

From: chrismcrc@yahoo.com <chrismcrc@yahoo.com>
Sent: Monday, February 17, 2020 12:44 PM
To: Orquina, Jessica A (FAA) <Jessica.A.Orquina@faa.gov>; Kolb, Gary (FAA) <Gary.Kolb@faa.gov>
Subject: Message from www.faa.gov: public comment to the dac

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Message:

Dear DAC Members,

Multi rotor and fixed wing Autonomous, GPS aircraft are the issue. CLASSIFICATION IS THE ANSWER! 1. Model Aircraft do not operate in the same way Drones do. 2. Recreational RC Model aircraft need a runway and flying space from a hundred feet, several hundred feet to about a thousand feet + for turbine aircraft. Model Aircraft fly at fields that will accommodate the size of aircraft flown. From a baseball field up to an abandoned airport and everything in between. 3. Model aircraft fly in a race course pattern just like full scale aircraft at an airport. A down wind, base leg and final approach. Not a cylinder as proposed in the NPRM. 4. 400' from the pilot or transmitter is in most cases is not possible.

Medium and large scale aircraft need hundreds if not a thousand feet away from the pilot to operate safely. The larger the aircraft the further out it can be seen. A small UAS or model aircraft say 12" across will start lose orientation at a few hundred feet. A large aircraft with a 10' wingspan can be seen and flown safely with orientation at hundreds of feet well beyond 400'. Visual Line of Site (VLOS) is keeping the aircraft in sight with the ability to safely control it. Not just see it. Not always 400'. Essentially the orientation as to keep control. I encourage anyone who doesn't know how model aircraft are flown to search on YOUTUBE. You will not find VLOS Model Aircraft flying close to full scale aircraft, getting close to sensitive areas of national security or other unsafe activities to get a video to post to make it go viral. If you search Drone, FPV you will find Beyond Visual Line of Site (BVLOS) activities that threaten security and may interfere with full scale aircraft TIME AFTER TIME. 5. I have talked to many full-scale Pilots are not worried about Model Aircraft as they know where sites are or the altitude flown outside of controlled airspace is well above even the 400' or 800' where RC Model Aircraft fly. WHAT DOES SCARE THEM IS DRONES FLYING AT HIGH ALTITUDE OUTSIDE OF VLOS , BVLOS BECAUSE OF THE ALTITUDE. 6. LANNAC CURRENTLY IN USE IS A SOLUTION TO RC AIRCRAFT FLOWN OUTSIDE A FIXED FLYING SITE. IT CAN ISSUE A NOTAM TO ALERT PILOTS OF ACTIVITIES. 7. FIXED FLYING FEILDS SHOULD HAVE A BOUNDARY RING AND INFORMATION AS AN AIRPORT DOES. 8. The FAA MUST categorize UAS into smart, logical classifications. Under these classifications, appropriate & realistic rules & regulations should apply to that classification ONLY. The costs of Remote ID equipment and registrations fees should apply to Commercial and Part 107 pilots only. Recreational pilots MUST be recognized separately and have alternative, non evasive options. Possible classifications the FAA should consider: Commercial Classified, registered and requirements as full scale Aircraft Class I) Large UAS / passenger transportation Class II) Large UAS / package delivery Part 107 (small businesses photo/video) REMOTE ID REQUIRED AS STATED IN NPRM Class I) Heavy (+100 lb) BVLOS Class II) Medium (-100 lb) BVLOS, FPV, VLOS Class III) Light (-50 lb) BVLOS, FPV, VLOS Recreational Class I) +55 lb, BVLOS, FPV, VLOS (CBO permit) Class II) -55 lb - BVLOS/FPV/VLOS (CBO permit for BVLOS/FPV, NO permit or Remote ID for VLOS)** Class III) -25 lb - VLOS (NO GPS or autonomy) (NO permit, NO Remote ID)* * Acknowledges R/C hobbyists and Academy of Model Aeronautic (AMA) members who have been safely flying in the NAS with private & commercial full scale aircraft for 60+ years. ** Some system of Remote ID should ONLY apply to those multirotor platforms or aircraft system that are built with GPS and autonomous flying capabilities - not traditional LOS aircraft.

Regards,

Chris Mays

-----Original Message-----

From: waynecorder@yahoo.com <waynecorder@yahoo.com>

Sent: Tuesday, February 18, 2020 11:36 AM

To: Orquina, Jessica A (FAA) <Jessica.A.Orquina@faa.gov>; Kolb, Gary (FAA) <Gary.Kolb@faa.gov>

Subject: Message from www.faa.gov: public comment to the dac

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Message:

Dear reps

I have been a Radio controlled Modeler for decades and a member of the Academy Of Model Aeronautics flying safely and at a designated sanctioned model airfield far and away from any possible commercial drone airspace. FAA wants to steal our airspace for commercial drones. This is not right. I say theft because I saw a clip of the comity round table where the AMA for what ever reason was not there to educate the impact these new rules will have on this multi million dollar hobby.

The comity is fabricating issues to make the hobbyist look like we are the problems. I for one would have them submit proof of these allegations. One gentleman even said we are jamming navigational equipment, This is a false statement, I would again not put trust in hear say as these people are bent in stealing our airspace and make criminals of us all. Please invite the AMA to educate these people and keep our hobby intact as we have a better safety record than even the FAA. Thank you Wayne Corder.

From: Timothy Smith <timsmith441@gmail.com>

Sent: Wednesday, February 19, 2020 2:54 PM

To: Kolb, Gary (FAA) <Gary.Kolb@faa.gov>

Subject: DAC meeting 2/27/20

Mr Kolb,

As you sit down to discuss the integration of UAS into the NAS, I would like to encourage the FAA and the DAC to seriously consider breaking out your rules and discussions into two separate categories. Visual Line of Sight (VLOS) and Beyond Visual Line of Sight (BVLOS). Putting all UAS users into one bucket called "drones" is not going to work in my opinion. In full scale aviation there are separate flight rules for IFR and VFR. Why not create separate workable rules for VLOS vs. BVLOS? VLOS operators (i.e.: Legacy Modelers) have operated safely for many decades and continue to do so without safety concerns. By imposing overbearing unnecessary rules on legacy modelers, I fear two things will happen. 1. You will have a very high level of non-compliance and will turn the average recreational user into a criminal. 2. The hobby will be decimated. This will have far reaching results. The hobby industry will be effectively shut down and many hundreds of companies put out of business. There will be a severe shortage of pilots emerging from this great hobby of model aviation into full scale aviation. You will be taking away a wonderful pastime for modelers like myself, who like to build their airplanes and fly them safely in the countryside away from people/houses/airports and buildings. This is my number one recreational activity; I spend hours every day working on my latest project.

I strongly urge you to work with the AMA, to develop your rules. Why is the largest stakeholder for recreational users being ignored? Congress instructed the FAA to work with stakeholders, but the FAA went so far as to say in the NPRM on RID that the AMA was not considered. Why not? We are the largest recreational users of the NAS at low altitudes and have been since flight was invented.

Thank you for your consideration

Timothy Smith

From: Ron <erospawn@yahoo.com>

Sent: Wednesday, February 19, 2020 9:14 PM

To: Kolb, Gary (FAA) <Gary.Kolb@faa.gov>
Subject: Docket Number: FAA-2013-0259

Dear Mr. Kolb,

As you sit down for the upcoming Drone Advisory Committee, I wanted to give you a few things to consider. I saw a video from the Deputy FAA Administrator from the recent UAV symposium where the 3c's of non-compliance were being discussed. The "Clueless", "Careless", and the "Criminal". I started thinking about that and realized these new rules are aimed squarely at DRONES. I noted the idea of FAA Recognized Flying Sites and that they were designed to go away, with the idea being remote id would become cheaper and easier and the fields would become unnecessary. But I also realized, it will only become cheaper and easier because DRONES are sold as a single unit ready to fly with Transmitters. Model Aircraft do not. The FRIAs was really designed to give a place for wayward Drone hobbyists unable to comply with remote id, a place to fly until their DRONES could be replaced with remote id compliant ones.

Considering these new regulations only apply to DRONES, they do not consider the Hobby of Model Aviation at all. Model Aircraft are not sold as Ready To Fly units except for Foam models and even those require some assembly. Remote id will not become cheaper and easier because it does not take model aircraft into account. The FRIAs do NOT take Model Aviation into account. I'm a builder, and I fly what I build. Buying ready to fly units is not Model Aviation. Therefore, these regulations completely ignore me. They make the existence of the Model Aviation Hobby impossible because the Registration, Production and Manufacturing standards do not consider Model Aviation. There is NO PATHWAY FOR MODEL AVIATION TO BECOME COMPLIANT. I ask you to consider how such a path can be made.

These new rules are for the "safety and security of the NAS" and the integration of unmanned aircraft into the NAS. While I agree that something needs to be done to ensure that we are all safe, Model Aviation has consistently proven it is a safe hobby for the last 80+ years. Model Aviation has already integrated into the NAS successfully, decades ago. Model Aviation is not your problem. Drones with Beyond Line of Sight and Autonomous capabilities are. So, consider the demarcation mentioned here. Those flown by visual of line of sight vs those capable of Beyond Visual Line Of Sight and with Autonomous capabilities. Those are the DRONES usually causing all the problems. I have a simple solution to that. Ban the sell of those DRONES with BVLOS and Autonomous capabilities from retail stores and allow them to be sold only at Licensed Commercial Dealers. Then allow the sale of said devices only to certified, licensed Commercial operators. That in and of itself, would probably cut out much of the problem.

These rules are a slap in the face to anyone who is a Model Aviation hobbyist. The moral of the story is, it does NOT pay to be a law-abiding citizen and fly safely and responsibly. These new regulations go much too far as written. A much better, more reasonable solution must be out there.

Please take into consideration the damage you are already doing to the hobby and to the industry. You have introduced increased complexity and now entire uncertainty to a hobby that has always

been a safe one. You have already caused business to lose revenue and are already causing new people to avoid getting involved. You do realize that Model Aviation is the main feeder of participants in Full scale aviation and the aerospace industry, right? You do realize that Model Aviation has always been a family oriented, wholesome sport, hobby and educational pursuit, right? Instead of trying to kill this hobby, you should be encouraging it and the FAA should be working with partners to make places available for people to participate. Because this hobby is a great contributor to Aviation and the aerospace industries. America already has a severe shortage of participants in Aviation and aerospace, so why are you killing model aviation?

As a Model Aviation enthusiast, and well educated at that, I am not "Clueless". I am not "CARELESS", and I am NOT a "Criminal". If I choose to keep flying safely and responsibly as I have all my life, it would be in a safe, remote out of the way area, away from anyone. That's not "Careless". Since I am not flying with malicious intent, that's not "Criminal". Since you've provided no pathway for me to be compliant, either you are ignoring me, You want me to go away, or I am a criminal just for not complying with remote id, which I would never be able to under these new rules anyway. Now YOU will make me into a criminal overnight. It's not like I grew up with these regulations already in place. I did not. I spent my whole life in this hobby, collecting, buying and building. I'm close to retirement now and I had planned on wiling away my time building the kits I've collected, scratch building and flying those kits, and you're telling me I will be a criminal if continue as I will have no way to comply and no place to legally fly. I am Model Aviation. I am NOT "CLUELESS". I am NOT "CARELESS". I am NOT a "Criminal". I am a builder and an aviation enthusiast, and I will not simply fade away.

<http://www.savemodelaviation.org>

-----Original Message-----

From: chrismcrc@yahoo.com <chrismcrc@yahoo.com>

Sent: Thursday, February 20, 2020 7:10 PM

To: Orquina, Jessica A (FAA) <Jessica.A.Orquina@faa.gov>; Kolb, Gary (FAA) <Gary.Kolb@faa.gov>

Subject: Message from www.faa.gov: public comment to the dac

This email was sent through the Federal Aviation Administration's public website. You have been contacted via an email link on the following page:

www.faa.gov/uas/programs_partnerships/drone_advisory_committee/

Message:

Any UAS that fly outside of a FRIA or CBO recognized site should meet the RID requirements as in the NPRM. UAS within FRIA or CBO recognized sights will follow CBO and FAA regulations including but not limited to no BVLOS flying and FPV with a spotter. The UAS will be taking off and landing at this site most often the size of a football field or smaller. UAS in FRIA or CBO recognized sites will have the operator located on site, easily for Law Enforcement to find. As Modelers have done for decades we police ourselves at flying sites and DO NOT tolerate illegal or unsafe behavior. We will and have called the authorities for such behavior.

Bad people are going to do bad things and will find ways around any laws. UAS can be made from parts gathered from various sources or fabricated with home CNC or 3D printers. The next terror attack will not necessarily come from or highly unlikely come from a manufactured drone like a DJI. A bomb, chemical or biological weapon can be used with ANY vehicle. The likelihood of a terrorist, foreign or domestic using a UAS especially a small UAS is extremely remote. If there is an underlying credible threat to National Security then it should be dealt with on a case by case basis as in any another threat.

UAS "Drone" and Model Aircraft involved in actual contact with full scale aircraft is minuscule in comparison to the actual number of UAS "Drone" and Model Aircraft, in the millions. And out of those that have made contact with full scale aircraft there has only been one incident that has downed a small civilian aircraft in Germany in 1997, killing 2 pasengers. 1 incident out of the 80+ years and Billions of flight hours of Model Aviation. How many things do we do each day that have a ten fold higher probability.

FAA has not done a thorough straight forward risk analysis on the dangers recreational UAS are thought to pose. The numbers of reported UAS when investigations by Local Authorities turn out to be just sightings or other objects believed to be Drones. Also findings of several reports, some initiated by the FAA, over state the dangers UAS pose.

Therefore the FAA is overreaching and burdening law abiding citizens there right to freedom and happiness because something "might" happen going beyond the de minimis risk principle which has no credible proof.

-----Original Message-----

From: chrismcrc@yahoo.com <chrismcrc@yahoo.com>

Sent: Thursday, February 20, 2020 7:11 PM

To: Orquina, Jessica A (FAA) <Jessica.A.Orquina@faa.gov>; Kolb, Gary (FAA) <Gary.Kolb@faa.gov>

Subject: Message from www.faa.gov: public comment to the dac

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Message:

Exhibit A

From GOA.com

GOA-18-110

May 24, 2018

"Small Unmanned Aircraft Systems: FAA Should Improve Its Management of Safety Risks

Federal Aviation Administration's (FAA) information on the extent of unsafe use of small unmanned aircraft systems (UAS) in the national airspace system is limited. Although FAA collects data on several types of safety events involving small UAS, the accuracy and completeness of the data are questionable. For example, since 2014, pilots and others have reported to FAA over 6,000 sightings of UAS, often flying near manned aircraft or airports, but FAA officials told GAO that FAA cannot verify that small UAS were involved in most of the sightings. Officials explained that small UAS are often difficult for pilots to

identify definitively and typically are not picked up by radar. Such data limitations impede the agency's ability to effectively assess the safety of small UAS operations.”

“Of the five key principles of safety risk management in its policies, FAA—in its regulatory efforts related to small UAS—followed two and partially followed three. FAA followed the principles of (1) defining appropriate roles and responsibilities for safety risk management and (2) describing the aviation system under consideration. FAA partially followed the other three principles: (1) analyzing and assessing safety risks; (2) implementing controls to mitigate the risks; and (3) monitoring the effectiveness of the controls and adjusting them as needed. For example, FAA did not consistently analyze and assess safety risks in terms of their severity and likelihood; FAA officials told GAO that for some efforts, the agency did not have sufficient data to do so. However, for other efforts for which FAA did not have sufficient data, the agency made estimates based on expert judgment, as allowed under the agency's safety risk management policy. Improved risk management practices would help FAA determine whether additional actions are needed to ensure the safety of the national airspace and provide FAA and other decision-makers with confidence that FAA is focusing on the most critical safety risks posed by small UAS.”

Exhibit B

From AMA

May 2017

Full article: <https://www.modelaircraft.org/sites/default/files/UASSightingsAnalysisbyAMA5-10-17.pdf>

“As drone sales soar, vast majority of reports remain simple sightings”

“AMA’s analysis of the February 2017 data confirms that the vast majority of reports are simply sightings of UAS sharing the airspace. Reported near misses and close calls remain very small – just 3.4%.”

“While the overall number of reports increased in the February 2017 data, this dataset included a longer time period and these sightings occurred within the context of a dramatic uptick in the number of people flying UAS. In late March 2017, the FAA announced that more than 770,000 drone operators have registered their drones with the FAA since the registration rule went into effect in December 2015. The total number of sightings the FAA has reported – 2,616 since August 2015 – only accounts for 0.34% of the total number of registered operators.”

“the February 2017 data contains reports of several objects other than drones, including balloons, birds, a parasail, a “blob” and a “silver box.” The term drone continues to be used as a “catch all” for any object spotted in the sky.”

“However, based on the data available to the public, it is clear that most UAS reports are “sightings” and not near misses, close calls or close encounters.”

“REPORTED A KITE OR UAS PASSED BY AIRCRAFT”

“A DRONE AT ROUGHLY 200 FEET OVER THE PARKING LOT”

“The analysis of the FAA’s February 2017 data on UAS sightings bears close resemblance to the trends previously identified in the August 2015 and March 2016 data. In all data sets, the overwhelming majority of reports are simply sightings, the data continues to contain reports on many objects that

aren't drones and a significant number of reports aren't referred to law enforcement or law enforcement notification is unknown."

Exhibit C

From:UAST

December 2017

"The working group undertook to review and better qualify and quantify informative data for 3,417 reports spanning August 2015 through March 2017.

Initial review of the data showed widespread variance on a number of critical parameters. The working group undertook to at least partially mitigate these shortcomings through a consensus-based data analysis methodology that sought to provide reliable and potentially actionable insights. This methodology is more fully described below, but was designed to use a variety of parameters that may enhance the veracity and informative nature of the reports. Data points—such as whether the report was filed by a pilot and whether evasive action was taken—were questions the working group felt improved the quality of the overall analysis. Data that could potentially be excised was included in order to assure an informative sample size. Examples of this include sightings where there was no violation of regulations or the sighting was of an object other than a drone, such as a bird or balloon."

"While we believe the working group's methodology helped provide valuable insights, ultimately the data set is too inconsistent and unstandardized to extract concrete conclusions. The current structure, inconsistency and unrefined nature of the sightings reports disproportionately exacerbate concerns about manned-unmanned interactions and do not provide industry or government with actionable data on which to base safety enhancements and regulatory or operational decision-making. As noted in our findings, some valuable data can be extracted, but we believe a concerted effort to define the scope can significantly improve the quality of sightings, and that enhanced and continuing education in both the manned and unmanned community will provide a measurable improvement for all aircraft operating in the National Airspace System (NAS)."

"Second, the data is too inconsistent and not standardized to make concrete conclusions. The data makes clear that each sighting or event did not pose the same level of risk to the NAS. In fact, a sighting may even represent completely legal, FAA-authorized operations. A sighting may also be benign, represent a possible FAR violation, or reflect an actual risk occurrence to the NAS. However, making a determinative conclusion on the level of risk for each event is difficult for a large majority of the sightings because the data contains a notable amount of inconsistencies and unknowns. These underlying observations formed the basis for recommendations below to improve the quality of data reported and education of the aviation community in this area."

Exhibit D

From https://utm.arc.nasa.gov/docs/2017-Barr_Aviation_2017-3272_ATIO.pdf

AIAA AVIATION Forum

5-9 June 2017, Denver, Colorado

17th AIAA Aviation Technology, Integration, and Operations Conference Preliminary Risk Assessment for Small Unmanned Aircraft Systems

Analysis Conclusions details range from "Extremely Remote" "Catastrophic" to "Minor" "Probable" risk of fire or endangering wildlife in a remote/rural location. See Risk assessment Chart Pgs 25-55

Exhibit E

From SCIPOL Duke University

June 2018

As requested by the FAA

<https://scipol.duke.edu/track/report-national-academies%E2%80%99-committee-assessing-risks-unmanned-aircraft-systems-integration-0>

One of the key points in this report is how the conservative risk culture adopted by the FAA is inhibiting the potential of UAS. In making this claim, the NASEM assume that UAS are not as hazardous as the FAA makes them out to be. The Academies suggest that lack of “empirical data in this nascent industry” has resulted in overly cautious approaches to UAS risk management that are founded on subjective analyses. The NASEM also assume the risks associated with UAS integration into the NAS can be classified under the de minimis risk principle. In doing so, the NASEM recommend the FAA ignore this negligible risk and change their traditionally risk averse attitude

-----Original Message-----

From: dave.lovitt@gmail.com <dave.lovitt@gmail.com>

Sent: Friday, February 21, 2020 2:35 PM

To: Orquina, Jessica A (FAA) <Jessica.A.Orquina@faa.gov>; Kolb, Gary (FAA) <Gary.Kolb@faa.gov>

Subject: Message from www.faa.gov: public comment to the dac

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www.faa.gov/uas/programs_partnerships/drone_advisory_committee/

Message:

February 21, 2020

Dear FAA,

My name is David Lovitt and I am 71 years old. I have had a passionate love for aviation since I was very young. I am an avid model aviation enthusiast. I have been since 1963. I fly everything from small foam built micro models to large models of military jet aircraft with real turbine engines in them. I have been doing so safely my entire time as a hobbyist. I am also a holder of a private pilot license and instrument rating, although I did not pursue aviation as a career. My skill as a pilot of model military jets has given me the opportunity to perform at many military and civil airshows. What an honor that has been! The last 57 years of my life have been extraordinary because of this hobby. Over these many years, I have seen so many lives change for the better because of this hobby!

I would like to commend the FAA on their efforts to make our NAS safer. The need for this in the last ten years has increased substantially with the technological advance of autonomous drones with GPA guidance, inertial stabilization, onboard cameras, and first person view (FPV). It is of grave concern to me as a licensed pilot that the proposed regulations do not address the safety of those aircraft and people already using this airspace. I remind you that crop dusters, air ambulance, power line inspections, ultralights, fire fighting aircraft, sky diving and a myriad of others use this airspace every day. RID does nothing to ensure their safety and your proposal ensures a great deal of conflict with these operators. What good are they if the proposed regulations do not protect these operations? The problem is with autonomous UAV operations beyond line of sight.

In comparison, however, traditional radio controlled line of sight models have already proven themselves to be safely integrated into the NAS for decades. The statistics already prove this.

The remote ID NPRM proposal, and the regulations attached to it, are being blindly imposed upon the traditional modeling community. These regulations, as proposed, are costly, impractical, unworkable, and intrusive. They will, over time, completely destroy a hobby and sport safely enjoyed by hundreds of thousands. They will also over burden the FAA's already saturated workload. Especially impacted by these rules will be our youth, who will find this hobby far too complicated and costly to even consider. The future of our youth is already somewhat grim. Why take away an activity that provides the excitement and satisfaction of a sport without the need to be athletically capable? Why stifle the dreams and educational pursuit of young people who want a career in aviation?

As an avid member of the traditional model aviation community for 60 years, I urge you, PLEASE:

DO NOT require line of sight (LOS) model aircraft to carry expensive and restrictive onboard remote ID devices. They are flown within visual proximity of the pilot at all times.

DO NOT put a time limit on the establishment of FRIA flying zones. This must be an ongoing process, or eventually, most or all of them will disappear. This will only harm the safety of the NAS.

DO NOT restrict non FRIA flight to a 400 foot "bubble" as proposed. Very few aircraft can be safely operated in such a small area, especially high performance and aerobatic models that so many of us love to fly.

DO NOT require the separate registration of each aircraft. We have already registered as recreational UAS pilots. Our numbers are already written or stickered onto our aircraft. Some modelers have nearly 100 or more models. This would be over burdensome to all involved, modelers and FAA alike.

DO NOT refer to our models as "drones!" This is an insult to the traditional legacy modeling community! Additionally, PLEASE:

DO recognize the significant difference between drones and line of sight model aircraft.

DO recognize community based organizations like the AMA. Acknowledge their dedication to the safety of model aviation for decades. Exempt them from these burdensome rules, and make it easier on the FAA as well. Allow new CBOs to form and be recognized if certain criteria are met.

DO restrict the availability of GPS guidance systems for the recreational operators. Only allow access to GPS guidance for commercial Part 107 operations. Create a firewall structure that requires a login to access GPS guidance. Most of the UAS safety issues will go away by restricting how far away they are capable of flying.

DO make the granting of FRIA flying sites an ongoing process. Flying sites get shut down and forced to relocate on a far too frequent basis.

DO make full size manned aircraft your safety priority. Far too often we have seen air disasters where innocent people on the ground are killed, in their own cars or their own homes. These proposed regulations for model aircraft are as restrictive, if not more restrictive, than many general aviation regulations.

And, please, DO listen to us, the modelers. We are people of excellent moral character. Many of us are private, professional or military pilots. We come from all walks of life. Our models have tremendous value to us. The safe operation of them in our NAS is paramount.

Remember, were it not for model aircraft, real aircraft would not exist. Many hundreds of thousands of aviation related jobs, including those within the FAA, would not exist.

Sincerely,

David Lovitt

-----Original Message-----

From: pwgalligan@gmail.com <pwgalligan@gmail.com>

Sent: Saturday, February 29, 2020 10:36 AM

To: Orquina, Jessica A (FAA) <Jessica.A.Orquina@faa.gov>; Kolb, Gary (FAA) <Gary.Kolb@faa.gov>

Subject: Message from www.faa.gov: public comment to the dac

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Message:

Attention:

Drone Advisory Committee and FAA

Subject:

FAA UAS Facility Maps

Dear DAC/FAA and Stakeholders:

I am writing to you to comment on Tasking #5 (Facility Maps), as discussed at the 2/27/2020 meeting of the Drone Advisory Committee with the FAA. I agree with the direction the committee is going with smaller 'sizing' of the grids depicted on the FAA UAS Facility maps. However, there are discrepancies in the boundaries of controlled airspace as shown on FAA Sectional Charts, and the way that same airspace is shown on FAA UAS Facility maps. The discrepancies lie in the methodology used to show the grids, themselves. On the UAS Facility maps, rectangle shapes are used exclusively to represent areas within controlled airspace. However, use of rectangles results in grid areas that actually exceed the boundaries of controlled airspace as shown on FAA Sectional Charts. An example is shown, below, for Class E airspace surrounding the Glens Falls, NY (KGFL) airport.

Figure 1-Sectional Chart

In the above screenshot of the FAA Sectional Chart for KGFL, note the 'shape' of Class E airspace, as shown by a dotted magenta line outlining that airspace. The northern portion of Class E stops just before Lake George near the southern portion of the lake.

Figure 2-AirMap LAANC app

In this next screenshot from the AirMap application, above, (part of LAANC), note that KGFL's Class E airspace accurately follows the same contours as shown on the FAA Sectional Chart.

Figure 3-FAA UAS Facility Map

The FAA UAS facility map, however, utilizes rectangular grid squares that actually exceed the boundaries of KGFL's Class E airspace. This results in a confusing depiction of 'where' UAS may actually fly, and fly legally. I would humbly suggest that the FAA update their facility maps using shape-files that accurately follow the contours of controlled airspace, resulting in a consistent message to both full scale and UAS pilots. That way we'll all be on the same page in the air, whether we're referencing an FAA Sectional, a LAANC application, or FAA UAS facility maps.

Thank you for taking the time to review my comments. I appreciate being part of the process.

Peter W. Galligan
West Rutland, VT
Email: pwgalligan@gmail.com
Ref. DAC20200227_Comments

NOTE: I have a PDF document that includes screenshots that I reference in this message. Please email me if you would like to see the actual examples that I talk about.

-----Original Message-----

From: mark@flighttestfact.com <mark@flighttestfact.com>

Sent: Saturday, April 04, 2020 10:20 AM

To: Orquina, Jessica A (FAA) <Jessica.A.Orquina@faa.gov>; Kolb, Gary (FAA) <Gary.Kolb@faa.gov>

Subject: Message from www.faa.gov: public comment to the dac

This email was sent through the Federal Aviation Administration's public website. You have been contacted via an email link on the following page:

www.faa.gov/uas/programs_partnerships/drone_advisory_committee/

Message:

To whom it may concern:

The DAC is well behind the power curve on providing advice to the FAA.

It should address the needs of optionally piloted aircraft and large drones. If it has a plan to do so, this information is not being shared well with the public.

Sincerely,
Mark Jones Jr.

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