



October 6, 2025

Jana Williams,
President & CEO
Association of Air Medical Services (AAMS)

Federal Aviation Administration
Docket Operations (M-30)
1200 New Jersey Avenue SE
Washington, DC 20590

Sent via <https://www.regulations.gov> only

Re: Docket No. FAA-2025-1908; Notice No. 25-07; Notice of proposed rulemaking (NPRM)
Normalizing Unmanned Aircraft Systems Beyond Visual Line of Sight Operations

The Association of Air Medical Services (AAMS) is the international trade association serving the entire air medical transport community. AAMS members provide air ambulance services, deploying over 1,000 helicopter and 200 fixed wing air ambulances across the United States. Established in 1980 and headquartered in Alexandria, Virginia, AAMS is a nonprofit 501(c)(6) organization dedicated to high-quality transport medicine accessible to all. AAMS champions our members' shared goal of promoting access to care through advocacy, collaboration, and education. AAMS represents and supports its members—air and ground medical transport providers, suppliers, and individuals—by promoting the highest standards of safety, quality patient care, and operational excellence. Through its leadership, AAMS fosters collaboration across the industry and champions the critical role of medical transport in healthcare systems worldwide.

On behalf of our members, AAMS recognizes the expertise of both the Air Medical Operators Association (AMOA) and Vertical Aviation International (VAI) in drafting their comments to the NPRM. AAMS appreciates the singular focus of AMOA in improving aviation safety and the broader rotorcraft perspective delivered by VAI. As the trade association for air ambulance services, AAMS welcomes the continued alignment and collaboration with our fellow associations. As such, AAMS fully endorses the comments provided by both AMOA and VAI and we urge the FAA to give these comments full consideration as FAA uses this opportunity to enhance low-level aviation safety and ensure the continued safe sharing of this airspace by manned and unmanned aircraft alike.

AAMS supports safe drone integration and recognizes the importance of advancing beyond visual line of sight (BVLOS) operations for unmanned aircraft systems. At the same time, improvements are needed in the proposed rule to reflect the realities of manned vertical flight operations and the important missions these aircraft perform. As proposed, the rule relies on inaccurate assumptions about the low-altitude environment, would unravel aircraft-to-aircraft avoidance procedures by undermining long-standing right-of-way frameworks, and will introduce avoidable hazards in

shared airspace. With targeted revisions, the FAA can strengthen the rule so that BVLOS integration enhances, rather than compromises, the safety and efficiency of the US National Airspace System. AAMS is grateful for the consistent and aligned feedback from across the vertical aviation community, making it easier to identify areas of broad agreement and prioritize fixes that improve safety outcomes.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jana Williams', with a stylized, cursive script.

Jana Williams

President & CEO

Association of Air Medical Services (AAMS)