

September 30, 2015

The Honorable Michael Huerta
Administrator
Federal Aviation Administration
800 Independence Avenue, SW
Washington, DC 20591

Dear Administrator Huerta:

Today marks the congressionally mandated deadline for the integration of unmanned aircraft systems (UAS) into the National Airspace System (NAS). While the Federal Aviation Administration (FAA) has hit some milestones in the integration process, it has yet to finalize small UAS rules, let alone facilitate the full integration of UAS that Congress contemplated in 2012. The increasing number of businesses applying for Section 333 exemptions demonstrates the pent-up demand for commercial UAS operations and the immediate need for a regulatory framework.

The benefits of UAS are significant. Whether it is assisting first responders with rescue missions, helping the insurance industry more efficiently survey damages due to natural disasters, or helping farmers improve crop yields, the applications of UAS are virtually limitless and enable public agencies and businesses to do things safer and more cost effectively. In fact, it is estimated that this industry will create more than 100,000 jobs and \$82 billion in economic impact during the first decade following integration. With the right regulatory environment, there is no question these numbers could go higher. But with each passing day that commercial integration is delayed, the United States continues to fall behind.

In the absence of regulations, American businesses and innovators are left sitting on the sidelines or operating under a restrictive exemption process. Simultaneously, states and municipalities are attempting to fill the current regulatory void, at times with laws that they may not have the authority to enforce. According to the U.S. Code, "The United States Government has exclusive sovereignty of airspace of the United States." The FAA needs to assert its authority over the NAS.

In addition to creating inconsistencies with federal law, state and local proposals have the potential to stifle innovation and create a complicated patchwork of laws. Some people are already confused about where they should and should not fly. For the continued safety of the airspace, the FAA needs to finalize the small UAS rules to bring greater clarity to, and awareness of, the policies governing UAS, not allow more confusion to take hold.

On behalf of businesses across a wide range of industry sectors in the United States, we urge the FAA to use all available means to finalize the small UAS rules immediately without any further delays and move ahead with the next regulatory steps on the path for integrating all UAS into the NAS. Once this happens, we will have an established framework for UAS operations that will do away with the case-by-case system of approvals, reducing the barriers to commercial UAS operations. And importantly, having more trained commercial operators will create a culture of safety that helps deter careless and reckless behavior.

Sincerely,



Brian Wynne
President & CEO
Association for Unmanned
Vehicle Systems International



Bob Brown
President
Academy of Model Aeronautics



AIRCRAFT OWNERS AND PILOTS ASSOCIATION

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