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U.S. Department of Transportation  
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Room W12-140, West Building Ground Floor  
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DRONSYSTEMS

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Dear Sir or Madame,

As representatives of UAS community we appreciate your attention to the issue, and would like to use this opportunity to thank you for taking the discussion to the next stage. We understand that the prime concern of FAA is safe and efficient operations in the National Aerospace System. While without doubts the industry is aligned in that sense with the regulators, we believe the final document should include provisions which would allow deeper penetration of the UASs into the NAS, without any compromises to the safety. Clearly, that would require introduction of an Air Traffic Management for UAS protocol, possibly developed around a hardware/software solution. Provided such a protocol will have become available, that will allow safe and efficient operations, as prescribed in FAA Charter; at the moment, a number of attempts have been made to evaluate the positive impact of the UAS industry on the national economy, but all estimates agree, that direct, indirect and induced effects will create a large number of jobs and stimulate further advances in science and technology.

We remain very optimistic that such a decision - to include provisions on lifting certain restrictions, provided that UAS' operators utilise a commercially developed safety protocol, certified by FAA - will eventually be made by the Regulator.

With reference to the FAA's proposed regulations, we would like to use this opportunity to express our opinion about certain issues which are of our concern, and potential impact of such issues on the industry:

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*Operational Limitations Section:*

- VLOS: the limitation is arguably the most restrictive and will cause severe impact on the users, operators, advances in ecommerce, science and technological development.
- Proximity to the Operator: as above; in addition, there are no currently means to enforce the rule.
- Operations over non-involved persons: impact on e-commerce and a number of other sectors, where UASs could have been utilised. As above - difficult to enforce.
- Daylight Operations: as above.
- Right of way: may not rely on the operator's ability to "see" - a UAS must have means to "see and avoid" without intervention from the operator.
- Operations in Class B, C, D, E: ATC may have limited ability to see the UAS. UAS must have means to be easily identifiable and in certain cases controllable by ATC if UAS can potentially be involved in a conflict with another airspace user.
- One UAS/One Operator rule: can severely limit application of the UAS for scientific use or complex operations.
- No operations from a moving aircraft: in certain circumstances, such as S&R operations, it could be the only way to operate a UAS from.
- No careless or reckless operations: very difficult to enforce and prosecute.
- Preflight Inspection: can be replaced with sophisticated asset management tools or UAS self-diagnostic.
- Physical/Mental Condition: impossible to enforce - as the case with Germanwings has recently demonstrated.

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*Operator Certification & Responsibilities*

- The certification process effectively restricts access to a large number of operators, and makes fully-autonomous (automatic) operations impossible.
- Paper-based checks complicate the process, and effectively makes activity of third-parties (such as insurance community) impractical.

*Aircraft Requirements*

- Airworthiness is paramount for safe and efficient operations. Administrative work can be outsourced to private sector and the Regulator should have direct access to the latest records.

It is our belief that the issues raised can be addressed with the use of the Automated Traffic Management for UAS protocol mentioned. That would allow wider UAS application, where safe operations of all UASs in NAS will be carried out in a fully automated mode without any additional burden to ATCSPs; prevent conflicts between UASs and GA traffic; would facilitate Asset Management features, and, ultimately, allow for full integration of the UASs into the existing and future airspace structure. DronSystems, just like a large number of other market players and stakeholders, see huge potential in Beyond-Line-of-Sight UAS' Operations, and believe that the existence of an UAS-ATM protocol should pave the way to the removal of certain restrictions proposed in the FAA's document.

We will be happy to provide any additional comments if required.

Sincerely yours,



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