

April 17, 2018

The Honorable John Thune
Chairman
Committee on Commerce, Science and
Transportation
United States Senate
Washington, DC 20510

The Honorable Bill Shuster
Chairman
Committee on Transportation and Infrastructure
U.S. House of Representatives
Washington, DC 20515

The Honorable Bill Nelson
Ranking Member
Committee on Commerce, Science and
Transportation
United States Senate
Washington, DC 20510

The Honorable Peter DeFazio
Ranking Member
Committee on Transportation and Infrastructure
U.S. House of Representatives
Washington, DC 20515

Dear Chairmen Thune and Shuster and Ranking Members Nelson and DeFazio:

Our organizations—representing the commercial drone, aviation, aerospace and technology sectors, and organized labor—have a critical interest in the safe and secure integration of unmanned aircraft systems (UAS), or drones, into the National Airspace System (NAS). To safely and securely integrate the airspace, basic “rules of the road” are necessary. Just like the highways on land that we traverse every day, it is critical that all vehicles navigating the “highways in the sky” participate in the broader drone ecosystem. Policy and regulations defining these rules are a necessary step to expand drone operations in a constructive and safe manner. Legislation is necessary now to enable the Federal Aviation Administration (FAA) to regulate the NAS in a common-sense way.

We strongly urge Congress to repeal Section 336 of the FAA Modernization and Reform Act of 2012, which prohibits the FAA from regulating qualifying model aircraft. In its place, Congress should include language in the 2018 FAA Reauthorization Act enabling the FAA to regulate all UAS users of the NAS to maintain safety, to streamline drone and model aircraft operations, and to protect the efficacy of future Unmanned Aircraft Traffic Management (UTM) systems.

Over the last few years, we have seen headlines about near-misses between drones and manned aircraft, drones flying over airplanes or airports, drones crashing into helicopters, and drones flying where they should not. These challenges will become even more apparent as model aircraft in the airspace grow in number. As of December 31, 2017, over 873,000 model aircraft owners had registered with the FAA, while only about 110,000 commercial drones registered with the FAA in the same time frame. Over the next five years, the FAA predicts the number of hobbyist drones will more than double to 2.4 million units.

The sheer number of hobbyist aircraft taking to the sky makes exempting model aircraft from regulation counterproductive in terms of safety and airspace management. Additionally, it is nearly impossible for law enforcement to enforce FAA rules when they are not able to determine in an effective manner whether a drone is being operated as a model aircraft or a drone authorized under FAA rules.

Since the implementation of the FAA’s Part 107 in 2016, which for the first time broadly authorized commercial drone operations in the U.S., society has benefited from commercial drone use in numerous ways. But for society to realize the full benefits of drones, we all need to abide by some low-cost “rules of the road.” We ask that Congress give the FAA the authority that is required to create a framework for

seamless UAS integration by repealing Section 336. The future of the drone industry in the US, and the ability of law enforcement and public agencies to keep our NAS safe and secure, depends on it.

Respectfully,

Lisa Ellman
Gretchen West
Co-Executive Directors
Commercial Drone Alliance



Sharon L. Pinkerton
Senior Vice President, Legislative and
Regulatory Policy
Airlines for America



Tim Canoll
President
Air Line Pilots Association, Int'l



Paul Rinaldi
President
National Air Traffic Controllers Association



Peter F. Dumont
President & CEO
Air Traffic Control Association



Dan Schwarzbach
Executive Director / CEO
Airborne Public Safety Association



Peter Bunce
President & CEO
General Aviation Manufacturers Association



Matthew S. Zuccaro
President & CEO
Helicopter Association International



Todd Schlekeway
Executive Director
National Association of Tower Erectors



CC:
Senate Majority Leader Mitch McConnell
Speaker Paul Ryan
Senate Democratic Leader Chuck Schumer
House Democratic Leader Nancy Pelosi