

8 April 2014

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

Dear Administrator Huerta:

Since the Federal Aviation Administration (FAA) was tasked with overseeing the safe integration of Unmanned Aircraft Systems (UAS) into the National Airspace System (NAS), it has implemented a number of key steps to further this important process. However, the publication of the Notice of Proposed Rulemaking (NPRM) for small UAS remains a missing and critical piece of the puzzle. Meanwhile, the recent *FAA v. Pirker* decision underscored the immediate need for a safety structure and regulatory framework for small UAS.

The potential benefits for UAS cannot be underestimated. Whether it is helping farmers improve crop yields, assisting first responders with search and rescue missions, or advancing scientific research, UAS are capable of saving time, saving money and, most importantly, saving lives. 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. But with each passing day that commercial integration is delayed, the United States continues to fall behind.

The safety of our skies and fellow citizens is our top priority. That is why we support regulations to govern the technology. We recommend the FAA use all available means, including Section 333 of the FAA Modernization and Reform Act of 2012, to allow for some limited UAS operations, subject to the Secretary of Transportation's safety determination, before the small UAS rule is finalized.

The current regulatory void has left American entrepreneurs and others either sitting on the sidelines or operating in the absence of appropriate safety guidelines. The recreational community has proven that community-based safety programming is effective in managing this level of activity, and we highly encourage the FAA to allow similar programming to be used to allow the small UAS industry to establish appropriate standards for safe operation. Doing so will allow a portion of the promising commercial sector to begin operating safely and responsibly in the national airspace.

The time for resolution has come, and we cannot afford any further delays. The technology is advancing faster than the regulations to govern it. While the FAA has indicated its intention to appeal the Pirker decision to the full National Transportation Safety Board (cc'd), we strongly encourage the FAA to simultaneously expedite its public notice and comment for small UAS rulemaking as soon as possible.

Sincerely,



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President & CEO  
Association for Unmanned Vehicle Systems  
International



Bob Brown  
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Academy of Model Aeronautics



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