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27 January 2014

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

Dear Administrator Huerta:

With the Federal Aviation Administration (FAA) Modernization and Reform Act of 2012, Congress tasked your agency with the safe integration of unmanned aircraft systems (UAS) into the National Airspace System (NAS), setting a clear schedule with multiple benchmarks to ensure that this process is completed in a timely manner. While certain key steps in the integration process have been met, a critical component of the integration – the publication of the Notice of Proposed Rulemaking (NPRM) for Small UAS – has been plagued by continued setbacks.

The FAA has been working on this NPRM since 2009. Most recently, the FAA this month indicated that the small UAS rule is now expected to be published in November 2014 – almost four years late. As the world's largest non-profit organization devoted exclusively to advancing the unmanned systems and robotics community, my organization, the Association for Unmanned Vehicle Systems International (AUVSI), is concerned that further delay of this rule will hinder the industry and prevent this revolutionary technology from taking off.

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. The industry, meanwhile, is poised to boost local economies and create jobs. AUVSI's economic impact study found that, in the first decade following integration, the UAS industry will create more than 100,000 jobs and \$82 billion in economic impact. However, each day that integration is delayed will lead to \$27 million in lost economic impact.

In the last few months, your agency has made significant strides in the UAS integration process. The November 2013 release of the UAS Integration Roadmap, the December 2013 announcement of six federally designated UAS test sites, and the first commercial flight of a UAS in the U.S. Arctic were all important milestones on the path toward unlocking the potential of unmanned aircraft. However, until the FAA writes the rules for small unmanned aircraft, the commercial UAS industry will remain grounded.

Specifically, we encourage you to use the authority granted by Congress in Section 333 of the FAA Modernization and Reform Act to allow for some limited UAS operations before the rule is finalized, especially in areas where there is little risk to manned aircraft or people on the ground, such as around power lines, pipelines and rural farms.

While we recognize the challenges of safely integrating UAS into the NAS, we hope you make the publication of this NPRM one of your top priorities in 2014. We look forward to working with you and the FAA to ensure UAS are integrated safely and quickly so we can all benefit from the tremendous potential these systems offer. Please do not hesitate to contact me if there is anything we can do to help.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Toscano".

Michael Toscano
President and CEO
Association for Unmanned Vehicle Systems International