

26 August 2014

Docket Management Facility
U.S. Department of Transportation
1200 New Jersey Avenue SE
West Building Ground Floor, Room W12-140
Washington, DC 20590

Subject: Comments to FAA Docket Number FAA-2014-0474, Amazon Prime Air Petition for Exemption

To whom it may concern,

The Association for Unmanned Vehicle Systems International (AUVSI), the world's largest non-profit organization representing the unmanned systems industry, with more than 7,000 members worldwide, including 600 corporate members, supports Amazon's effort to deliver packages using small unmanned aerial vehicles, and we hope the FAA uses any and all means to allow Amazon to test their systems domestically in a safe and responsible manner.

Unmanned aircraft systems hold tremendous potential to create jobs, boost local economies, and keep people safe. In a report issued last year¹, AUVSI found that the UAS industry is poised to create over 100,000 new jobs and over \$80 billion in economic impact within the first ten years following the integration of UAS into the national airspace system. Amazon says 86% of the products they sell weigh less than five pounds, which will allow them to be used on their small unmanned delivery aircraft. Amazon wants to test their systems outdoors in the U.S., opposed to overseas. Amazon's exemption adequately addressed the safety requirements in a number of federal aviation regulations², and there is a compelling need for the FAA to allow Amazon to test their systems to ensure the next evolution in package delivery happens in the U.S. first.

In recognition of the growth potential of this new industry, in Feb. 2012, Congress mandated the FAA write the rules to safely integrate UAS into the national airspace by 2015³, a deadline the U.S. Department of Transportation Inspector General⁴ and Government Accountability Office⁵ have regrettably said will not be met. Luckily, Congress had the foresight to include section 333 in the FAA Modernization and Reform Act (Public Law 112-95⁶) which allows the Secretary of Transportation to determine if certain UAS may operate safely in the airspace before the FAA finalizes rules for widespread commercial use of small UAS.

Although AUVSI applauds the FAA's efforts to consider UAS exemption requests⁷, AUVSI remains concerned the FAA is more than three years late in issuing safety regulations for the wide-spread

¹ www.auvsi.org/econreport

² 14 CFR Parts 21.191(a), 45.23(b), 91.9(b), and 91.203(a)(b)

³ [https://www.faa.gov/regulations_policies/reauthorization/media/PLAW-112publ95\[1\].pdf](https://www.faa.gov/regulations_policies/reauthorization/media/PLAW-112publ95[1].pdf)

⁴ http://www.oig.dot.gov/sites/dot/files/FAA%20Oversight%20of%20Unmanned%20Aircraft%20Systems%5E6-26-14_0.pdf

⁵ <http://www.gao.gov/assets/670/660683.pdf>

⁶ [https://www.faa.gov/regulations_policies/reauthorization/media/PLAW-112publ95\[1\].pdf](https://www.faa.gov/regulations_policies/reauthorization/media/PLAW-112publ95[1].pdf)

⁷ <http://www.auvsi.org/auvsinews/associationnews>

commercial use of small UAS⁸. On 8 April 2014, AUVSI and 32 other association representing the manned aviation community, air traffic controllers, and future users of UAS, including agriculture groups, realtors, media organizations, and public safety organizations, sent a letter to the FAA strongly encouraging them to grant exemptions but to also expedite the public notice and comment for small UAS rulemaking⁹. The FAA expects to release its notice of proposed rulemaking for small UAS in November¹⁰.

The commercial UAS industry will not be allowed to fully take off until regulations, not just exemptions, are finalized. Troublingly, FAA officials have publically said the regulations will take at least 16 months after the public comment period ends before it is finalized. That is simply unacceptable.

Accelerating commercial UAS use will not only help businesses harness the tremendous potential of UAS, they will also help unlock the economic impact and job creation potential of the technology. AUVSI looks forward to continuing to work with the FAA and other stakeholders to ensure UAS are integrated safely and responsibly as quickly as possible. The FAA should actively work with Amazon and others to look for ways to allow for limited commercial use of UAS today, and get on with rulemaking.

Respectfully submitted,

A handwritten signature in cursive script that reads "Michael Toscano".

Michael Toscano
President & CEO
AUVSI

⁸ <http://www.dot.gov/regulations/report-on-significant-rulemakings>

⁹ <http://higherlogicdownload.s3.amazonaws.com/AUVSI/958c920a-7f9b-4ad2-9807-f9a4e95d1ef1/UploadedFiles/Joint%20Letter%20to%20FAA%20on%20Expediting%20UAS%20rulemaking%20Final.pdf>

¹⁰ <http://www.dot.gov/regulations/report-on-significant-rulemakings>