



February 2, 2018

Honorable Daniel K. Elwell
Acting Administrator
Federal Aviation Administration
800 Independence Avenue SW
Washington DC 20591

Dear Acting Administrator Elwell:

The Small UAV Coalition¹ urges the FAA immediately to move to a proposed rule to establish standards for remote identification and tracking of unmanned aerial systems (UAS). Until such remote identification and tracking requirements are in effect, a fully developed UAS regulatory framework – one that will enable safe, routine low altitude operations beyond the visual line of sight and autonomously – will be out of reach in the United States.

These efforts should build on the recommendations of the UAS Identification and Tracking Aviation Rulemaking Committee (ARC) Final Report, which was submitted to you at the end of September 2017. The Coalition urges the FAA to move forward with a rulemaking that requires all UAS operators who are required to register with the FAA to abide by remote identification and tracking requirements.

Remote identification and tracking requirements are not simply a prerequisite to enabling the FAA to move forward with rulemakings to allow operations over people, beyond the visual line of sight, and other expanded operations, but also a solution to safety, security, and privacy concerns. The Coalition believes these concerns will not be fully addressed – nor will the law enforcement be satisfied– if a large segment of UAS operations is exempt from a remote identification and tracking requirement. The Coalition supports the same 250 gram threshold the FAA chose for its registration requirement, the first step the FAA took towards ensuring accountability.

There are difficult choices to be made with respect to the technological solutions identified in the Final Report, data requirements, data collection and storage, and how best to ensure effective implementation throughout the diverse universe of UAS operators. Because identification and tracking technology continues to evolve, the proposed rule should be based on performance standards; this will enable industry to innovate and improve identification and tracking solutions over time. The notice-and-comment process will provide the opportunity to resolve these important issues and any necessary standards could and should be developed in parallel.

¹ Small UAV Coalition members include Airmap, Amazon Prime Air, Google [X] Project Wing, Intel, Kespry, PrecisionHawk, Verizon, Aerwaze, AGI, Flirtey, Fresh Air Educators, T-Mobile, and Walmart.

The Coalition and its members, many of whom participated in the ARC, shared the FAA's sense of urgency in standing up the Committee. We echo members of Congress, including House Transportation and Infrastructure Committee Chairman Shuster, in calling on the FAA to move forward. The Coalition stands ready and willing to assist the FAA in formally launching the rulemaking process with the same sense of urgency, and we respectfully request a meeting with you at your earliest convenience to provide our support.

Sincerely,

