September 11, 2020

The Honorable Steve Dickson
Administrator
Federal Aviation Administration
800 Independence Avenue, SW
Washington, DC 20591

Dear Administrator Dickson,

We write in response to the proposed rule on the remote identification of unmanned aircraft systems (UAS). Together, we represent a cross-section of the model aviation, general aviation, and commercial UAS sectors. We agree that safety and security are critical to the successful integration of UAS in the United States. However, we urge the FAA to make essential changes to protect and sustain the model aviation community.

Model aviation is a gateway for millions of people into the world of aviation, and it is critical to the future of aerospace innovation in the United States. The aviation pioneers of tomorrow are discovering flight today by designing and flying their own aircraft, often using freely available electronics and household materials.

However, the proposed rule will make it nearly impossible for everyday hobbyists to share the skies. They will need to incorporate highly automated equipment into home-built models and implement manufacturing processes comparable to a commercial aircraft. These requirements are infeasible for hobbyists who experiment in their garage, buy material at the local hardware store, and fly in their backyard or the local park.

We urge the FAA to consider alternative approaches that promote safety and security while supporting model aviation. For example, hobbyists could notify their planned flight area to the FAA and other observers on the ground via smartphone app. Today, drone operators can fly in controlled airspace around our busiest airports by notifying their planned flight area to the FAA through apps. The FAA should be applauded for digitizing these capabilities in an accessible way. That approach is safe, smart, and sensible, and could apply to remote identification. Likewise, organizations such as clubs or schools should be permitted to renew and establish new “identification areas” over time, pre-vetted by the FAA.

We share the FAA's interest in promoting responsible flying. However, the proposed rule will make it difficult for everyday Americans to comply, and it will have a significant impact on the future of this community. As the FAA moves toward finalizing the rule, we appreciate your support in finding a path forward that keeps our skies open to all.



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