

March 5, 2021

Via Electronic Mail

The Honorable Pete Buttigleg Secretary of Transportation U.S. Department of Transportation 800 Independence Avenue, SW Washington, DC 20591

Dear Secretary Buttigieg:

Congratulations on your recent confirmation as U.S. Secretary of Transportation. The Commercial Drone Alliance¹ (CDA) looks forward to working closely with you and your team to leverage and enable the fast-growing commercial unmanned aircraft systems² (UAS or drone) and advanced air mobility (AAM) industries for the benefit of all Americans. If properly enabled by the U.S. government, the UAS and AAM industries can support the continued revitalization of the U.S. economy, keep Americans healthy, enhance worker safety, and promote sustainable transportation solutions—all while ensuring America's continued leadership in aviation innovation and enhancing the growth and development of the U.S. commercial drone and AAM industries.

We write to highlight and advance two critical priorities. First, as you have rightly communicated, supporting the American public during the pandemic, including distribution of critical goods and the COVID-19 vaccine, is an urgent national priority – as is creating jobs and protecting the environment. The commercial drone industry can help. The U.S. Department of Transportation (DOT) has a critical role to play in meeting these challenges.

Today, the United States has the technology to use UAS to deliver a wide range of goods and medical supplies in a faster, safer, cleaner, lower-cost, and more equitable manner. In fact, American companies are using these capabilities right now in foreign countries. Drones can provide medicine and food to those who are mobility-challenged or lack access to a car. They can be used to serve isolated populations and ensure equitable distribution in an environmentally responsible manner. Drone delivery can bring needed

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¹ The CDA is an independent non-profit organization led by key leaders in the commercial drone and advanced air mobility industries. The CDA brings together commercial drone end-users, manufacturers, service providers, advanced air mobility companies, drone security companies, and vertical markets including oil and gas, precision agriculture, construction, security, communications technology, infrastructure, newsgathering, filmmaking, and more. The CDA works with all levels of government to collaborate on policies for industry growth and seeks to educate the public on the safe and responsible use of commercial drones to achieve economic benefits and humanitarian gains. Learn more at www.commercialdronealliance.org.

² CDA supports the use of non-gendered language to refer to drones that encourages diversity and inclusion in this critical and fast-growing field of emerging technology. We applaud the Federal Aviation Administration for tasking its Drone Advisory Committee with evaluating options to promote language that reflects a more inclusive approach. CDA looks forward to supporting that effort.

medical supplies and other essential goods closer to the patient, thus reducing the need to bring more people to already crowded health centers, pharmacies, and commercial areas. By directing DOT to prioritize approval of routine expanded drone operations, you can help American companies quickly go about providing these services to communities across the country.

Second, the Administration has an opportunity to lead the world in the use of drone technology to inspect America's aging infrastructure. Infrastructure inspection represents the most common use case for drone technology. But current inspection operations are largely limited to visual line of sight, impairing efficiency and requiring workers to tackle dangerous jobs that they could otherwise perform with a drone to achieve higher levels of safety and lower levels of environmental impact.

To supercharge safety and efficiency, the Administration should unlock the airspace by starting from the ground up. DOT should direct the Federal Aviation Administration (FAA) to enable low-altitude Beyond Visual Line of Sight (BVLOS) operations to inspect critical infrastructure across the country, such as bridges, energy facilities, and railroads. These operations—"shielded" from crewed aircraft by virtue of operating in close proximity to structures and terrain—can be conducted safely *now*. Authorizing commercial operators to conduct these operations within a framework designed to ensure safety would curb carbon emissions, enhance safety, and markedly increase economic productivity while creating jobs.

As Secretary of Transportation, you have the power to provide guidance that instructs DOT to be bold in embracing and enabling new ideas, technologies and approaches, and to be creative and innovative in its interpretation of laws, rules and regulations. With this approach, we can unlock America's transportation resources with appropriate, but not excessive, oversight. Specifically, you can issue guidance to the FAA to set priorities, devote leadership and resources, and issue internal instructions that accelerate the adjudication of all outstanding requests for authorizations from American operators including Part 135 applications - that are capable of delivering COVID-19 vaccines and associated medical supplies, or otherwise assisting communities through critical, low-risk operations as we collectively battle the COVID-19 crisis.

The FAA's BEYOND program provides an immediate opportunity. Initiated in October of 2020, BEYOND focuses on enabling BVLOS operations that are repeatable, scalable and economically viable with specific emphasis on infrastructure inspection, public safety and small package delivery. We encourage you to make the BEYOND program your own—re-branding and amplifying the program and making it bigger, bolder, and more inclusive. This program—along with the FAA team leading it—is a critical force multiplier for the DOT / FAA and is essential to the American commercial drone and broader AAM industry.

We hope that you share CDA's goal of enabling this critical technology that can provide extensive benefits and essential services to all Americans and ensure America's continued leadership in sustainable aviation innovation. CDA would like to request a meeting with you to discuss concrete actions you can take to achieve these goals.

Sincerely,

Lisa Ellman

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