



U.S. Department of Transportation
Docket Operations, M-30
1200 New Jersey Avenue SE
Room W12-140
Washington, D.C. 20590-2251

Dear Secretary Foxx and Administrator Huerta,

The Experimental Aircraft Association (EAA) is the world leader in recreational aviation. With an international membership of more than 190,000 people in over 100 nations, EAA brings together pilots, aircraft builders, owners, and aviation enthusiasts who are dedicated to sharing *the Spirit of Aviation* by promoting the continued growth of aviation, the preservation of its history and a commitment to its future.

EAA is commenting on action by the DOT and FAA to require registration of all unmanned aircraft systems (UAS), including model aircraft, contained in federal docket FAA-2015-4378 and published in the Federal Register as number 2015-26874.

Though EAA was not invited to participate in the UAS registration task force formed by DOT, EAA appreciates the opportunity to comment on the proposed action and requests our comments be considered as the task force formulates its recommendations.

As with the FAA's proposed rulemaking on the operation and certification of UAS for commercial purposes, EAA believes that any new rulemaking that regulates UAS should be formed with the safety of manned aircraft as the primary goal. Whatever the scope of DOT's proposed UAS registration system, EAA remains committed to the following key points:

1. No restrictions on airspace access should be placed on manned aircraft as a result of UAS integration.
2. Safety of manned flight being paramount, manned aircraft should always have priority and right-of-way over UAS within the NAS.
3. Manned aircraft should not have additional equipment requirements mandated for their use in controlled airspace or otherwise.

Education

If registration is to become a mandatory element of commercial and recreational UAS ownership, EAA believes concurrent education on safe stewardship of the NAS is necessary. UAS users should not only have awareness of the legal consequences of unsafe use, but should also have awareness of the consequences of risking the safety of pilots and passengers in manned aircraft. EAA is a supporter of resources such as the Know Before You Fly campaign, which seeks to educate UAS users on safe operation within the NAS. It is imperative that UAS do not endanger human life. Though accountability is one aspect of maintaining safe operations,

ensuring UAS operators have the knowledge to fly responsibly within the NAS will maximize the potential for safe integration of UAS.

Practicality of Registration

The registration of UAS and model aircraft should not become such a burden on the FAA as to interfere with its ability to effectively regulate the safety of the NAS. The DOT task force should explore options that would alleviate the burden on regulatory authorities. Organizations such as the Academy of Model Aeronautics (AMA) require members to affix member numbers and contact information to their model aircraft. Users that follow such programs could be allowed to meet the UAS registration requirements, which would decentralize the process while maintaining the accountability that DOT seeks through registration. Even with such accommodations, EAA has doubts about the practicality of requiring registration of the millions of UAS and model aircraft currently used for recreation and hobby in the United States. Additionally, EAA is concerned that the magnitude of operation for such a system would overshadow alternative safety measures, such as education of UAS operators.

Fees

If a fee structure is developed for registration, EAA stresses that such additional fees should not carry over into the manned aircraft community. Fees for manned aircraft and UAS should be collected separately and the amount collected for each sector should have no direct relationship.

Conclusion

EAA supports any measure that will ensure safe UAS integration without adversely impacting the status of manned aircraft within the NAS. Though UAS registration will create a system of accountability, the safe relationship between UAS and manned aircraft depends on the aeronautical knowledge of, and the responsible decisions made by UAS operators. Since registration would be a massive undertaking, any registration system should be adopted to ensure optimal efficiency and should not create resource demands that would impact the FAA's ability to effectively regulate safety. EAA urges the UAS registration task force to formulate reasonable guidance for the DOT to create a system that maximizes safety for all users of the NAS.

Respectfully,

A handwritten signature in black ink, appearing to read "Sean Elliott", written in a cursive style.

Sean Elliott
Vice President, Advocacy and Safety