



WISCONSIN LEGISLATURE

P.O. BOX 8952 • MADISON, WI 53708

April 20, 2015

The Honorable Michael Huerta
Administrator
U.S. Federal Aviation Administration
Attn: Docket ID: FAA-2015-0150

Dear Administrator Huerta:

As state-elected officials, we are concerned about the potential negative economic impact that portions of the recent Federal Aviation Administration's (FAA) small unmanned aircraft systems (UAS) Notice of Proposed rulemaking (NPRM) will have on the commercial UAS industry in Wisconsin.

Wisconsin applauds the FAA for deciding to move forward with proposing a framework for the commercial use of small UAS within America's borders. Our country has a proud heritage of embracing technology and being a world leader in innovation; however, in the UAS industry, we are not embracing this legacy. If American UAS companies hope to compete abroad, it's vital the FAA get this NPRM right, and remain open to making adjustments as technology evolves, and industry, safety and privacy concerns continue to change.

Below are five specific provisions in the NPRM we are concerned about as currently proposed.

1) Visual Line Of Sight (VLOS) is too limiting. Safe operations beyond visual line of sight is feasible with current technical approaches (visual observers), formal operating procedures, and currently available technical solutions (radio communications and first person viewing).

2) Allow small UAS to fly over people not involved in the operation. The term "populated area" is inadequate and seems to indicate "any single person within the area of operation that is not inside a structure," and could eliminate a considerable amount of missions. Surveying and mapping businesses need the ability to fly over areas where infrastructure and people exist. For example, mapping:

- Parcels for infill development such as industrial parks.
- Environmental remediation or construction sites over time.
- Corridors for telecommunications and utility lines.
- Flood modeling including: bridges, levees, topography.
- Industrial plans for energy generation and distribution.

3) Reference Page 14 of NPRM: "A small UAS operator would be required to see and avoid all other users of the National Airspace System in the area in which the small UAS is operating." This should be revised in the NPRM with the use of a flight plan.

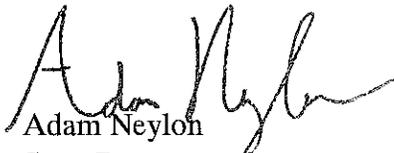
4) The NPRM states public entities must get a Certificate of Waiver or Authorization because they are not “exempt” from restrictions in the proposed rules. However, the proposed rules allow public entities to “declare an operation to be a civil operation” and therefore operate commercially and be exempted from flight restrictions.

5) Existing technology does provide a way to resolve the “see-and-avoid” or vision based aircraft detection issue, by using the Master Restricted Flight Area Database and existing wireless technologies.

In addition to the above mentioned specifics in the NPRM, the FAA has not promulgated, clarified, or made public its rules, policies and legal opinions on public versus commercial UAS. This is necessary if the FAA’s goal is to have an informed public moving forward. It’s also important to mention that UAS technology can provide the additional function of surveillance of critical infrastructure, enabling utilities to better secure their systems and work with law enforcement to protect their facilities from disruption.

The opportunity exists for UAS technology to provide significant economic and societal benefits. The private sector is poised to fully participate in the development and implementation of this emerging technology. If possible, the NPRM should also consider offering performance based standards, because new technologies are coming fast and the FAA should be careful to not paint the private sector into a corner. The key moving forward is for the FAA to be responsive to industry needs without compromising safety and privacy.

Sincerely,



Adam Neylon
State Representative
98th Assembly District



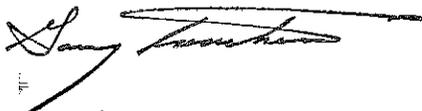
Scott Krug
State Representative
72nd Assembly District



Bob Kulp
State Representative
69th Assembly District



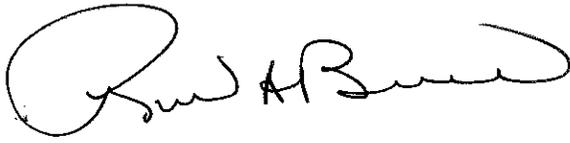
Mike Rohrkaste
State Representative
55th Assembly District



Gary Tauchen
State Representative
6th Assembly District



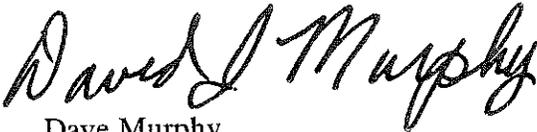
Tom Larson
State Representative
67th Assembly District



Rob Brooks
State Representative
60th Assembly District



David Steffen
State Representative
4th Assembly District



Dave Murphy
State Representative
56th Assembly District



Dan Knodl
State Representative
24th Assembly District



John Macco
State Representative
88th Assembly District



Mike Kuglitsch
State Representative
84th District