

April 24, 2015

Docket Operations
M-30
U.S. Department of Transportation
1200 New Jersey Avenue, SE.
Room W12-140
West Building Ground Floor
Washington, DC 20590-0001

Re: Docket No.: FAA-2015-0150, Operation and Certification of Small Unmanned Aircraft Systems

The National Business Aviation Association (NBAA) represents the interests of more than 10,000 Member companies who operate general aviation aircraft as a solution to some of their business travel needs. Over NBAA's 66-year history, the Association and our Membership have been active participants in the development, analysis and implementation of numerous regulatory initiatives that have impacted the business aviation community. We believe that this involvement has helped to produce sound and effective safety policy related to the operation aviation aircraft in the National Airspace System (NAS).

The business aviation community has a long and demonstrated history of partnership with government safety agencies. These partnerships are based on common objectives and underscore our preference for working cooperatively with these agencies to jointly develop solutions. It is in that spirit that the NBAA offers these comments on the FAA's proposed requirements for the operation and certification of small-unmanned aircraft systems

NBAA Involvement with UAS

Over the past decade, NBAA has participated in numerous government and industry efforts to develop standards and guidance to help facilitate the safe introduction of unmanned aerial systems (UAS) operations into the NAS. This work started in 2005 with the creation of RTCA Special Committee SC-203: Unmanned Aircraft System and Unmanned Aircraft and follow-on work with SC-228: Minimum Operational Performance Standards for Unmanned Aircraft Systems. The experts participating in

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SC-203 developed most of the principles and functional requirements that we see included in the FAA's proposal.

The RTCA Committee's work resulted in the creation of valuable reference documents including:

- DO-304: Guidance Material and Considerations for Unmanned Aircraft Systems
- DO-320: Operational Services and Environmental Definition (OSED) for Unmanned Aircraft Systems
- DO-344: Operational and Functional Requirements and Safety Objectives for Unmanned Aircraft System Standards

In addition to RTCA, NBAA's participation on the FAA's UAS Aviation Rulemaking Committee (ARC) will lead to the development of a comprehensive set of recommendations for the Agency on safely incorporating UAS into a NAS designed around manned aircraft.

FAA Small UAS (sUAS) Proposal

NBAA's review of the Agency's proposal reveals that, broadly, the FAA has taken a sensible, measured approach to the introduction of commercial sUAS operations into the NAS. While many of the Agency's proposed requirements reflect guidance provided by the UAS ARC, we have identified some proposed requirements that we believe could negatively affect aviation safety when sUAS are operated around airports. We have highlighted these concerns in our attachment.

Additionally, NBAA has attempted to provide constructive feedback for nearly all of the Agency's questions contained within the proposal. Again, each response is covered in the attachment. Our attachment references pages contained in the proposal published on the FAA's website, not the version printed in the *Federal Register*.

Conclusion

UAS offer great promise for a variety of applications in many areas of life and commerce, including opportunities for use by entrepreneurs and companies that rely on aviation as part of doing business. That said, NBAA has long maintained that it is imperative that any introduction plan for UAS be thoughtful, deliberative and focused

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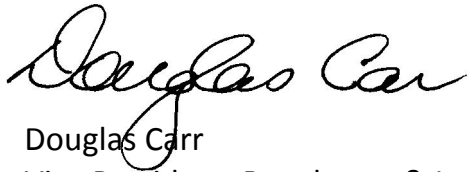
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on safety. This means UAS should not share the same airspace with manned aircraft until they have equivalent certification and airworthiness standards as manned aircraft, including the ability to take timely directions from air traffic control, and to sense and avoid other aircraft and UAS.

NBAA appreciates the work of the FAA and the previous 10 years of industry and government collaboration that set the stage for the release of this proposal. While we believe that commercial sUAS operations can safely operate within the confines of the Agency's proposed rule, the FAA must balance the total regulatory burden being levied upon these operators with the realities of a growing, energetic and exciting industry that has just begun to explore their capabilities and potential services.

Please let us know if we can provide any additional information.

Regards,

A handwritten signature in black ink that reads "Douglas Carr". The signature is written in a cursive, flowing style.

Douglas Carr
Vice President, Regulatory & International

ATTACHMENT

NBAA Comment #	Page #	NPRM Language	NBAA Comments
1	General	None	FAA should work with appropriate consumer product agencies to require s-UAS manufacturers to enclose safety and operational literature from the “Know Before You Fly” campaign, and other sources that may add value, with all s-UAS packaging as a means of educating commercial s-UAS operators on safe operations in the NAS.
2	General	In various instances throughout the NPRM the FAA proposes limiting s-UAS to an altitude of 500 feet AGL or less and speeds of 100 mph or less in line of sight operations	NBAA believes the previous 400 foot altitude for UAS operating under AC 91-57 should also apply to commercial s-UAS (400 feet is the equivalent of a 40 story building). NBAA suggests that the FAA limit s-UAS to a maximum Above Ground Level (AGL) height of 400 feet. We believe that this would provide a sufficient level of protection between s-UAS operations and other aircraft operating above 500 feet. NBAA does not have sufficient direct operational experience to determine if 100 mph is an appropriate limit for an s-UAS. However, NBAA has contacted several companies offering insurance for s-UAS and at least one of them places a 30mph limit on any s-UAS they will insure. We recommend that the Agency study appropriate speed limitations for this category of UAS.
3	General		As with most commercial operations regulated by the FAA, the Agency normally requires commercial operators to secure insurance coverage reflecting the appropriate risk exposure of the operation. NBAA suggests that the Agency include requirements for insurance coverage to incentivize safe operations.
4	Various	The NPRM prohibits operations of small UAS in Class B, Class C, Class D and within the lateral boundaries of the surface area of Class E airspace designated for an airport without prior approval from the ATC facility having jurisdiction over that airspace.	NBAA believes that the FAA should also restrict operations around airports in Class G airspace. Aircraft operating at those airports are exposed to similar, if not greater, safety risks from s-UAS operations as those that operators face at airports in other Classes of airspace. We suggest a 3 mile radius around airports in Class G airspace.
5	16	The FAA invites commenters to provide data that could be used to quantify the benefits of this proposed rule.	It is important that the FAA seek any potential source of information that can quantify the costs and benefits of this proposal. We believe that a complete cost-benefit analysis should drive the Agency's full consideration of each proposed mandate.
6	31	We invite comments on whether there are well-defined circumstances and condition under which operation beyond the line of sight would pose little or not additional risk to other users of the NAS, the public, or national security.	NBAA agrees with the FAA that technology has not matured to the extent that would allow an s-UAS to be used safely beyond line of sight (BLOS). However, we encourage the Agency to prepare for the introduction of technology that would create any equivalent level of safety for s-UAS operations BLOS within this rule. Our interaction with the s-UAS community suggests this capability could mature more quickly than the Agency's rulemaking process can accommodate.

NBAA Comment #	Page #	NPRM Language	NBAA Comments
7	31	Finally we invite comments on the technologies and operational capabilities or procedures needed to allow UAS flights beyond visual line of sight, and how such technologies, capabilities and procedures could be accommodated under this rule or in a future rulemaking.	As we stated previously in comment 6, we believe technology will mature quickly to allow an equivalent level of safety for BLOS s-UAS operations. An example of a potential enabling technology is "geo-fencing" that can define the operational footprint of an s-UAS.
8	32	Improved use and support of FAA UAS Test Sites and Center of Excellence	NBAA recommends that the FAA should define parameters that can safely accommodate continued research and development of advanced UAS capabilities the future center of excellence should be provided with authority to approve advanced UAS operational or testing capabilities, in coordination with ATC, that differentiates from those capabilities to be provided under the NPRM to better understand implications of integration and pursue development of technology and methods supporting continued safety in the NAS.
9	35	The FAA seeks comment on whether there are additional requirements that could be specified in ways that are more performance-oriented in order to minimize any disincentives to develop new technologies that achieve the regulatory objectives at lower cost.	NBAA concurs that performance standards are superior to design standards in regulating s-UAS
10	36	Accordingly , the FAA invites comments as to whether the final rule should relax operating restrictions on small UAS equipped with technology that addresses the concerns underlying the operation limitations of this propose rule, for instance through some type of deviation authority (such as a letter of authorization or a waiver).	As we stated above in comment #6, NBAA believes that the FAA should accommodate improved technology in its final rule by establishing a process in the rule for an alternative means of compliance or regulatory exemption that addresses, among other limitations, current BLOS restrictions.

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11	39	The FAA seeks comment on whether UAS should be permitted to transport property for payment within the other proposed constraints of the rule, e.g., the ban on flights over uninvolved persons, the requirement for line of sight, and the intent to limit operations to a constrained area.	Considering the FAA seeks to regulate commercial operations of s-UAS, we believe it is likely that operations of s-UAS could include the carriage of property for payment within the proposed constraints of the rule. In doing so, we suggest that the Agency define the performance requirements for s-UAS equipment involved in carrying property. Within the constraints of the proposed rule, we believe that carrying property for payment would not compromise the level of safety achieved by equivalent, non-property carrying s-UAS.
12	39	The FAA also seeks comment on whether a special class or classes of air carrier certification should be developed for UAS operations.	Today, the FAA generally defines classes of air carrier operations by size of aircraft, number of passenger seats and cargo capacity. As UAS capability increases, it is conceivable that we may evolve to a point where UAS training begins to look similar to in-aircraft pilot training (e.g. student and instructor). Therefore, NBAA recommends that consideration be given for creation of an sUAS operator training provider classification to support two-person (student-instructor) operations, with the instructor serving as both visual observer and secondary pilot (currently not permitted) to support student development of appropriate skills and experience under guidance and ultimate control of a more experienced operator.
13	40	...the FAA invites comments, with supporting documentation, on whether external-load UAS operations and towing UAS operations should be permitted, whether they would require airworthiness certification, whether they would require higher levels of airman certification, whether they would require additional limitations, and on other relevant issues.	As we stated in comment #11, as long as the operations remain within the constraints of the proposed rule we see little benefit from applying additional airworthiness or airmen certification requirements to s-UAS operations involved in external-load or towing operations. However, as sUAS are significantly smaller than GA aircraft involved in external load and towing operations today, the FAA should consider whether the small size of sUAS involved in these operations will create greater see and avoid challenges for other aircraft.
14	44	The FAA invites comments on the inclusion of foreign-registered small unmanned aircraft in this new framework.	NBAA agrees with the FAA to limit the scope of this rulemaking to U.S.-registered aircraft.
15	54	The FAA invites comments, with supporting documentation, on whether the regulation of small UAS should be further subdivided based on the size, weight, and operating environment of the small UAS.	NBAA believes that heavier and faster s-UAS can pose a greater safety risk to other aircraft, objects and people on the surface. The FAA should study the benefits of fewer requirements for s-UAS that are lighter and slower. However, NBAA recommends that micro UAS operators require the same level of education/training certification and operational oversight (e.g., registration) as any other sUAS (sub-55 pound) category.

NBAA Comment #	Page #	NPRM Language	NBAA Comments
16	58	The FAA invites comments on whether it should eliminate frangibility from the micro UAS framework	NBAA does not believe the FAA should eliminate frangibility from the micro UAS framework.
17	59	The FAA also invites commenters to submit data and any other supporting documentation on whether the micro UAS classification should be included in the final rule.	As we stated in comment #15, there are likely to be benefits from a lighter regulatory approach to micro UAS framework. We encourage the FAA to study this possibility.
18	59	The FAA invites further comments, with supporting documentation, estimating the costs and benefits of implementing a micro UAS approach in the final rule and what provisions	While NBAA believes there are likely benefits from a lighter regulatory approach to micro UAS, we would not want this rule to suffer any delays if the FAA must include micro UAS as a defined category.
19	59	Finally the FAA invites comments to assess the risk to other airspace users posed by the lesser restricted integration of micro UAS into the NAS.	NBAA supports further FAA analysis on the risks posed by micro UAS to airspace users.
20	62	Accordingly, the FAA proposes not to provide an operator with the emergency powers available to the PIC under 91.3(b). The FAA invites comments on this issue.	NBAA concurs with not providing an s-UAS operator with emergency powers available to the PIC under 91.3(b).
21	62	The FAA invites comments on whether a separate operator-in-command position should be created for small UAS operations.	Today, it is unclear what benefits may be derived from the introduction of additional "operator" and "pilot" categorizations for the operations of s-UAS. Since these operations will largely be excluded from airspace covered by traditional definitions of "operator" and "pilot," we agree with the FAA that there is no need to create a separate operator-in-command position.
22	63	...the FAA invites comments as to whether defining a new crewmember position as an "operator" would cause confusion with the existing terminology. If so, the FAA invites suggestions as to an alternative title for this crewmember position.	Throughout the FAA's broad regulatory structure the term "operator" is widely used. It appears that defining a person in control of an s-UAS as an "operator" falls within FAA's traditional broad application of the term. NBAA would support the use of the term "operator" or another suitable term to define this person.

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23	65	The FAA invites comments on whether the visual observer should be required to stand close enough to the operator to allow for unassisted verbal communications.	NBAA believes that s-UAS operators should determine if a visual operator (VO) is needed for the particular operation, not the FAA. In those situations where the s-UAS operator determines the need for a VO, we believe the operator should determine the best means to facilitate communications, whether assisted or unassisted, within the constraints of the proposed rule.
24	66	The FAA invites comments on whether an airman certificate should be required to serve as a visual observer.	NBAA does not believe an airman certificate should be a requirement to be a visual observer. However, the operator should ensure that a VO, if used, understands the limitations of s-UAS operations.
25	69	The FAA invites comments on this proposed visual-line-of-sight requirement. The FAA also invites suggestions, with supporting documentation, for other ways in which a first-person-view device could be used by the operator without compromising the risk mitigation provided by the proposed visual-line-of-sight requirement.	NBAA believes that the FAA should require that s-UAS operators derive primary flight parameters by direct observation of the actual s-UAS, much like a VFR pilot uses direct observation of the horizon and other aircraft to ensure separation while scanning their instrument panel for additional information.
26	69/70	The FAA also invites comments on whether it should permit operations beyond visual line of sight in its final rule, for example through deviation authority, once pertinent technology matures to the extent that it can be used to safely operate beyond visual line of sight.	As we stated in comment #6, NBAA believes that the final rule should account for improvements in technology that would safely permit BLOS operations.
27	71	The FAA welcomes public comments with suggestions on how to effectively mitigate the risk of operations of small unmanned aircraft during low-light or nighttime operations.	Generally, NBAA agrees that maintaining visual contact with an s-UAS at night is difficult and therefore should likely be restricted. However, there may be situations where sufficient artificial lighting can ensure continuous visual contact with the s-UAS. If the operator can demonstrate that sufficient artificial light exists to ensure continuous visual contact with the s-UAS, the FAA should consider allowing the operation. For example, inspection of lit sporting event stadiums at night before or after the event (seats empty).
28	75	...the FAA invites comments on whether a flight termination system or other technological equipage should be required and how it would be integrated into the aircraft for small UAS that would be subject to this proposed rule	NBAA agrees with the FAA that the rule should not require a flight termination system or mandate the equipage of any other navigational aid technology.

NBAA Comment #	Page #	NPRM Language	NBAA Comments
29	75	The FAA also invites comments , with supporting documentation, as to the costs and benefits of requiring a flight termination system or other technological equipment.	See comment # 28
30	76	...the FAA invites comments on whether the horizontal boundary of the contained area of operation should be defined through a numerical limit. If the boundary is defined through a numerical limit what should that limit be?	NBAA believes the FAA should undertake more study to determine the costs and benefits of establishing a defined horizontal distance as a limit for s-UAS operations. Individuals have varying capability to visually acquire, and safely control, a small s-UAS based on a variety of factors including age, size of the s-UAS, background and daylight conditions.
31	77	...invites comments, with supporting documentation, on whether small UAS operations should be permitted from moving land-based vehicles, and invites comment on a regulatory framework for such operations.	While NBAA understands the Agency's proposed limitation on moving vehicles, with an exemption to permit water-borne vehicles, it does not appear that the Agency has sufficiently justified their proposed exclusion of land-borne vehicles.
32	78/79	The FAA invites comments, with supporting documentation, on whether this propose 500-foot ceiling should be raised or lowered.	NBAA believes the previous 400 foot altitude for UAS operating under AC 91-57 should also apply to commercial s-UAS (400 feet is the equivalent of a 40 story building). NBAA suggests that the FAA limit s-UAS to a maximum Above Ground Level (AGL) height of 400 feet. We believe that this would provide a sufficient level of protection between s-UAS operations and other aircraft operating above 500 feet.
33	80	The FAA invites comments on whether this speed limit should be raised or lowered.	NBAA does not have sufficient direct operational experience to determine if 100 mph is an appropriate limit for an s-UAS. NBAA has contacted several companies offering insurance for s-UAS and at least one of them places a 30mph limit on any s-UAS they will insure. We recommend that the Agency study appropriate speed limitations for this category of UAS.
34	81	The FAA's proposed prohibition on operating over people would provide an exception for persons directly participating in the operation of the small unmanned aircraft.	NBAA believes that operations over people should be permitted under the rule providing that the s-UAS operator advises those people of the operation before it starts. Additionally, as previously noted, we recommend that the FAA require insurance for all commercial s-UAS operations.

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35	86/106	Specifically on this page the FAA refers to operators contacting/notifying ATC before operating in certain areas. On page 106 the FAA proposes the s-UAS operators have knowledge of "...radio communications procedures, which would include standard terminology."	NBAA strongly believes that allowing s-UAS operators to contact or notify ATC regarding s-UAS operations over ATC frequencies could substantially harm operational safety within the airspace controlled by that ATC facility. We would recommend that the FAA prohibit the s-UAS operator from using ATC frequencies to comply with the contacting or notification requirements of the proposed rule. Instead, NBAA suggests that the FAA develop a process that can easily facilitate an s-UAS operator seeking and receiving permission to operate in airspace otherwise restricted by this rule. For example, an operator seeking to conduct s-UAS operations within the lateral boundaries of Class D airspace could notify the ATC facility of their intent and the facility can quickly reply. Finally, if in cases where the appropriate ATC facility would only approve the s-UAS operation with radio communications as a condition of s-UAS operations, the s-UAS operator would be required to hold at least a Sport Pilot certificate in order to ensure familiarity with standard ATC phraseology and radio use. In the event the Agency does allow for some segment of s-UAS operators to transmit on ATC frequencies, then appropriate changes must be made to both the FAA JO 7110.65 and Aeronautical Information Manual.
36	86	The NPRM prohibits operations of small UAS in prohibited and restricted areas without permission from the using or controlling agency as applicable.	NBAA concurs with prohibiting operations within prohibited and restricted areas without permission from the using or controlling agency as applicable.
37	91	The FAA invites comments on the issues discussed in this section. The FAA also invites comments as to the costs and benefits of requiring small UAS operators to perform maintenance and inspections pursuant to existing regulations	NBAA concurs with the FAA's decision not to require s-UAS operators to perform maintenance and inspections pursuant to existing regulations.
38	97	The FAA invites public comment on its proposal to create a new category of airman certificate for small UAS operators.	NBAA agrees with the FAA's decision not to require a commercial pilot's certificate with a UAS type endorsement before operating an s-UAS. In addition, because of the substantially higher demonstrated knowledge of airspace, airport and ATC operations, NBAA believes that individuals that possess at least a Sport Pilot Certificate should only need to obtain an s-UAS rating for their existing certificate and not have to obtain a UAS Operator Certificate.

NBAA Comment #	Page #	NPRM Language	NBAA Comments
39	98	The FAA invites comments on whether the minimum age necessary to apply for an unmanned aircraft operator certificate should be similarly reduced to 16 years old in the final rule. (to equal balloon/glider certificate).	NBAA proposes an age limit of 16 to qualify for an s-UAS certificate. We believe that a lesser risk exists for s-UAS operations conducted within the confines of the rule when compared to glider and balloon operations conducted within controlled airspace.
40	98/99	The FAA further invites comments as to whether reducing the minimum applicant age to 16 years old would further enable academic use of small UAS	As stated in comment #39, NBAA supports an minimum age limit of 16 to obtain an s-UAS operator certificate.
41	103	The FAA invites comments on whether these applicants should be required to demonstrate flight proficiency and/or aeronautical experience (more).	NBAA agrees with the FAA's proposal not to require applicants for an unmanned aircraft operator certificate with a small UAS rating demonstrate flight proficiency or aeronautical experience equivalent to the proficiency required to properly control the flight of a manned aircraft.
42	103/104	The FAA invites comments as to whether other requirements, such as passage of an FAA-approved training course, should be imposed either instead of or in addition to the proposed knowledge test.	NBAA agrees with the FAA's proposal not to require applicants to take an FAA-approved training course.
43	107	The FAA invites comments on the proposed areas of knowledge to be tested on the initial knowledge test. The FAA also invites comments as to whether the initial knowledge test should test any other areas of knowledge. If so, what additional areas of knowledge should be tested? What would be the costs and benefits of testing these other areas of knowledge?	The sixth proposed knowledge test subject area references if the applicant understands how to calculate the weight and balance of the s-UAS to determine impacts on performance. NBAA agrees that knowledge of weight and balance calculations can have some limited benefit for s-UAS. The FAA should consider the limited ability of an s-UAS to change its center of gravity (balance) and limit the knowledge test to considerations of the effect of weight on s-UAS performance.

NBAA Comment #	Page #	NPRM Language	NBAA Comments
44	107	The FAA invites comments on the proposed areas of knowledge to be tested on the initial knowledge test. The FAA also invites comments as to whether the initial knowledge test should test any other areas of knowledge. If so, what additional areas of knowledge should be tested? What would be the costs and benefits of testing these other areas of knowledge?	The proposed ninth knowledge subject area proposes that operators have knowledge of radio communications procedures in order to communicate with ATC to operate safely near an airport. Earlier in our comment #35 NBAA opposed the use of radio communications to satisfy contacting and notification requirements of the proposed rule. If in cases where the appropriate ATC facility would only approve the s-UAS operation with radio communications as a condition of s-UAS operations, the s-UAS operator would be required to hold at least a Sport Pilot certificate in order to ensure familiarity with standard ATC phraseology and radio use. NBAA strongly objects to holders of only a s-UAS Operator Certificate being required to communicate on ATC frequencies and therefore believes this portion of the knowledge test should be deleted.
45	110	The FAA invites comments on whether the small UAS aeronautical knowledge test should have an option for online test-taking and, if so, what safeguards should be implemented to protect the integrity of the small UAS knowledge test, assure the FAA of the identity of the test taker, and protect the test-taker's PII that would be provided online...	NBAA believes on-line testing outside of a testing center environment is a needed capability however it should not hold up publishing of the final rule.
46	112	Just as with the knowledge test, the FAA invites comments on whether the small UAS recurrent aeronautical knowledge test should have an option for online test-taking and, if so, what safeguards should be implemented to protect the integrity of the small UAS knowledge test, assure the FAA of the identity of the test taker, and protect the test-taker's PII that would be provided online.	NBAA believes on-line testing outside of a testing center environment is a needed capability however it should not hold up publishing of the final rule.
47	114	The FAA invites comments as to whether this certificate should expire after a certain period of time. If so, when should the certificate expire?	NBAA agrees with the FAA's proposal not to include an expiration date on the certificate.

NBAA Comment #	Page #	NPRM Language	NBAA Comments
48	116	The FAA, however, does invite public comment as to whether an FAA medical certificate should be required.	NBAA agrees with the FAA's proposal for s-UAS operators to self-certify their medical condition at the time of their airman application.
49	117	The FAA invites comments on whether non-military COA pilots should be permitted to take the recurrent knowledge test instead of the initial knowledge test in order to obtain the unmanned aircraft operator certificate.	NBAA agrees with the FAA's proposal not to exempt non-military COA pilots from the testing requirements defined in this proposal.
50	118	Under this proposed rule the FAA would transmit a student pilot's biographical information for security vetting to TSA and issue an unmanned aircraft operator certificate only after receiving a successful response from TSA.	NBAA is concerned about the Agency's use of the term "student pilot" in this section as that term as defined by the Agency, is only applicable as to individuals seeking a pilot certificate. We recommend the use of another term defined by the Agency for this part.

NBAA Comment #	Page #	NPRM Language	NBAA Comments
51	119	A successful STA is generally valid for five years...	<p>NBAA generally agrees to subjecting s-UAS operators to a similar level of security vetting as is given to other FAA certificate holders. For the majority of pilots, the FAA and TSA conduct these checks through information provided by the airman on the application for a certificate. In this case, however, it appears that the FAA is suggesting that s-UAS operators should be subject to a higher level of security review than a student, sport or private pilot.</p> <p>We have reviewed TSA’s Security Threat Assessment requirements contained in § 1540.201, § 1540.203 and § 1540.205. While TSA’s requirements clearly establish who must receive a security threat assessment (STA), the regulations also seem to presume that a larger organization is involved and specifically applies a number of requirements on an organization rather than on an individual. In cases where an operator of a commercial s-UAS is a single person, it is unclear how the FAA and TSA plan to address requirements clearly developed for larger, more complex organizations.</p> <p>Additionally, it is unclear, based on the applicability of § 1540.201 which “includes the procedures that certain aircraft operators, foreign air carriers, indirect air carriers, and certified cargo screening facilities must use to have security threat assessments performed on certain individuals...” how s-UAS operators will be covered since the FAA has defined an s-UAS as something other than an aircraft.</p> <p>NBAA recommends that FAA and TSA develop clear, easy to follow, and appropriate security requirements for s-UAS operators that reflects TSA’s risk based security approach.</p>
52	119	The FAA invites comments with suggestions for how this period could be reduced.	See remarks supplied in comment #51.
53	122	The FAA invites comments on whether knowledge testing centers should be allowed to accept airman applications	NBAA believes that there could be significant efficiencies realized by developing a process that allows knowledge testing centers to accept s-UAS airman applications. However, this should not be done at the expense of publishing the final rule.
54	126	The aircraft's owner would send the following items to the FAA: ... (3) the \$5.00 registration fee	NBAA believes that there could be significant efficiencies realized by developing a process that allows for electronic payments. However, this should not be done at the expense of publishing the final rule.

NBAA Comment #	Page #	NPRM Language	NBAA Comments
55	128	...the FAA invites comments as to whether small unmanned aircraft owners should be required to provide additional information during the registration process.	NBAA recommends identical information, where available, be submitted for s-UAS registration as for any other aircraft registration.
56	130	The FAA invites comments on whether a small unmanned aircraft should be required to display its registration number in accordance with Subpart C of part 45. (More)	NBAA supports the FAA's proposed registration requirement (N-number) for commercial s-UAS. We recommend that the Agency work with s-UAS manufacturers to develop a process that prevents operating an s-UAS until the owner successfully registers the device. We also believe that this additional coordination will aid the Agency's efforts when addressing safety or operational violations. However, the FAA should consider the impact of registering a significant number of s-UAS and UAS within a system designed for potentially fewer total registered aircraft. We recommend that the FAA determine the most effective registration system for s-UAS that would not exhaust the maximum number of registration numbers ("N" numbers) available today.
57	131	The FAA invites comments, with supporting documentation, as to the costs and benefits of mandating compliance with Subpart B of part 45. (more)	NBAA concurs with the FAA proposal to not require s-UAS manufacturers install fireproof plating on s-UAS.
58	134	The FAA emphasizes that this proposed reporting requirement would be triggered only during operations that result in injury to a person or property damage...	NBAA agrees with the FAA that the operator should report certain accidents. We suggest that the operator should report accidents when (1) a person has to seek medical treatment as a result of the operation (operator or other wise) or (2) if property damage exceeds \$1,000 or (3) a police report is filed as the result of any s-UAS accident/incident. The Agency should explore establishing a web based reporting system to facilitate operator compliance with reporting requirements of this rule. Additionally, NBAA recommends that the FAA work with NASA to determine what modifications, if any, would be required to the Aviation Safety Reporting System (ASRS) to accommodate s-UAS reports.
59	136	Accordingly, the Secretary proposes to find that small UAS operations subject to this proposed rule would not create a hazard to users of the NAS or the public. We invite comments on this proposed finding.	NBAA believes that s-UAS operations subject to this proposed rule would not create a hazard to users of the NAS or the public.

NBAA Comment #	Page #	NPRM Language	NBAA Comments
60	136/137	Because the above provisions would limit the security risk that could be posed by small UAS operations subject to this rule the Secretary proposes to find that these small UAS operations would not pose a threat to national security. We invite comments on this proposed finding.	NBAA believes that s-UAS operations conducted within the confines of this proposal would not pose a threat to national security.
61	138	...airworthiness provisions... We invite comments on this finding.	NBAA believes that airworthiness certification would be unnecessary for s-UAS.
62	154	Therefore this proposed rule would have a significant positive economic impact on a substantial number of small entities. The FAA solicits comments regarding this determination	NBAA believes that this proposal could have a positive economic impact on small entities.
63	154	The FAA invites comments on the inclusion of foreign-registered small unmanned aircraft in this new framework. (more)	NBAA supports FAA's continued efforts to address the operation of foreign registered s-UAS within US airspace. However, this effort should not delay the publication of a final s-UAS rule.