



2 June 2023

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

Re: Docket No. FAA-2023-1256; UAS Beyond Visual Line of Sight and Associated Dockets

Dear Docket Operations:

On behalf of the below associations, we thank you for the chance to submit comments related to the UAS Beyond Visual Line of Sight technical effort, and the associated petitions for exemption, as delineated in:

- FAA-2020-0499; Summary Notice No. -2023-09 Petition for Exemption; Summary of Petition Received; Zipline, Inc.
- FAA-2022-0124; Summary Notice No. -2023-19; Petition for Exemption; Summary of Petition Received; Phoenix Air Unmanned, LLC.
- FAA-2022-0921; Summary Notice No. -2022-42; Petition for Exemption; Summary of Petition Received; uAvionix Corporation.
- FAA-2019-0628; Summary Notice No. – 2023-06; Petition for Exemption; Summary of Petition Received; UPS Flight Forward, Inc.

Our associations have proven track records as being strong advocates for the integration of the next generation of aircraft. As such, we fully support the FAA’s efforts to develop a system that will enable these aircraft to safely enter and operate in the existing aviation structure. As our efforts in the past have shown, only through well-thought, safety-driven processes, standards, and rules will we be able to succeed. We greatly value all opportunities for industry-agency collaboration, as we all work to develop viable solutions to achieve safe and effective BVLOS operations.

However, the undersigned are immediately concerned by the 20-day comment period associated with these dockets. Considering the significance of the questions being asked and data being sought, a 20-day comment period is wholly inadequate for the public to respond in a meaningful and well-thought manner. More importantly, within the narratives of the dockets, are neither an explanation for the short comment period nor for the urgency under which the Administration is working.

As such, we respectfully request these dockets be amended to extend the public comment period by an additional 40 days, for a total of 60 days. Granting this tailored and specific extension will not violate any legislative or executive requirement, nor create unnecessary risk to the public or National Airspace System.

We thank you for your consideration.

Sincerely,

Airborne Public Safety Association
Aircraft Electronics Association
Aircraft Owners and Pilots Association
Air Line Pilots Association International
Balloon Federation of America

Experimental Aircraft Association
Helicopter Association International
National Agricultural Aviation Association
National Air Transportation Association
National Business Aviation Association