



Academy of Model Aeronautics

District 1

New England

www.amadistrict-i.org



January 20, 2022 Club & District Officers ZOOM MEETING Report

"I think that it's a great idea to get club officers involved with happenings in the AMA and other things that affect our clubs and flying so that when questions arise we can get the story straight to our fellow members instead of rumors told at the fields."

Northeast R/C Model Club, Salisbury Massachusetts, Cappy Polito

"This was a fruitful meeting, looking forward to the next one"

Quinapoxet Model Flying Club
Rick Bedell

"I think the Zoom meeting is a Great Idea as a means of communication with the district and club members. You've hit the nail on the head with this forum!"

Granite State Quiet Flyers
Art Rockwell



"Thanks for hosting tonight's meeting. Very informative. I look forward to participating in future meetings."

Central Mass. R/C Modelers
Tom Siwek

"Great format, looking forward to attending again in the future."

Rhode Island Aeromodelers
Joe Pangborn - Jeff Arsenaull

"I attended the zoom meeting last night and thought it was great. It had a rough start (zoom waiting room) but in the end provided some good information that I can take back to the club I'm in. I do plan on attending future meeting."

Mid Coast Radio Control Club, Union, Maine, Greg Morse

January Zoom Meeting Summary & Report

Zoom attendance exceeded expectations with 47 officers from district 1 clubs participating in the 90 minutes of discussion. The agenda items to kickoff off this first meeting covered a very broad area outlined in FAQs that the district VP and AVPs frequently get asked by members.

Topic's covered included flying site altitude limit determinations and enforcement in controlled and uncontrolled airspace. Member TRUST and Registration requirements and enforcement considerations as well as a brief status report of AMA's CBO and club FRIA applications and Remote-ID modules.

key items were highlighted in the "2021 AMA Annual Report" and the 2021 Government Affairs Report that included membership growth, advocacy, AMA's Safety Handbook, FAA and club Safety Risk Mgt. Panels, and the use of the UASidekick APP.

Read rest of report with specific questions, details, and answers...

AMA FAQs for Discussion Consideration

Definitions:

FAA has the statutory authority to authorize higher altitudes for recreational operation of UAS/model-aircraft under the exception rules for a community based organizations (CBO) as specified in the 2018 FAA Reauthorization Act.

Controlled Airspace is airspace with defined dimensions surrounding airports within which air traffic control (ATC) services are provided. The radius around the airport surface may extend 3 NM – 5 NM.

Uncontrolled airspace (Class G) is airspace where an Air Traffic Control (ATC) service is not deemed necessary or cannot be provided for practical reasons.

FAA rules apply to the entire National Airspace System -- there is no such thing as "unregulated" airspace.

1. Altitude Enforcement – Are AMA clubs required to enforce FAA 400 ft. altitude limits for flight operations at club sites located in uncontrolled airspace and if they don't, will members and clubs AMA liability insurance coverage be in jeopardy?

- a) AMA and FAA are not requiring AMA clubs to enforce the FAA 400ft. altitude limit at club sites in uncontrolled airspace because the FAA and AMA are developing a risk based safety process to respond to higher altitude request by AMA clubs in uncontrolled airspace.
- b) Implementing regulations involves an incremental process that takes time.

So until the process is completed and safe risk-based altitude limits are determined and approved for higher altitudes by the FAA for AMA club flying sites in uncontrolled airspace, members are being allowed to exceed the 400 ft. limit.

- c) AMA's insurance provider will honor club and member insurance claims while new regulation are incrementally being phased in.

► INCREMENTAL PROCESS ► RISK BASED PROCESS ► CONTINUE SITE MAX ALT.

2. Altitude Limits – In spite of the FAA regulations that limit model aircraft flying altitudes in controlled and uncontrolled airspace what altitudes are AMA pilots currently limiting their flying to at AMA club sites and why are they able to do so?

- a) In controlled Airspace - AMA members may fly model-aircraft no higher than the maximum altitudes specified in the LOAs they have with FAA ATC, or as seen on FAA facility maps at the club site location.
- b) In uncontrolled airspace AMA members at AMA sites are limited to the maximum altitude that members have always flown until notified otherwise by the AMA.
- c) Members are able to fly above 400 ft. AGL while FAA and AMA are working on a safety risk based process (SRBP)/TBD and mitigations to approve the higher altitudes requested by the club.

► CONTROLLED - LOA OR SRMP ► UNCONTROLLED - SITE MAX ALT OR SRBP

3. Altitude Determinations – How is FAA determining or intending to determine UAS/model-aircraft altitude limits for AMA club sites in controlled and uncontrolled airspace and what is the current status of these efforts?

Clubs in Controlled Airspace:

- a. FAA regulations require all AMA flying sites located within controlled airspace must have Letters of Agreement (LOA) with the FAA Air Traffic Control (ATC) facilities located in the same airspace. The LOAs specify the maximum altitude limit for UAS/model aircraft flying which may be viewed on FAA's UAS Facility Map.

- b. Unfortunately, the UAS Facility Map altitudes for most clubs were much lower than the higher altitude limits members had been flying and in order for clubs to request higher altitudes limits an FAA Safety Risk Management (SRM) panel process must be done for each club site.
- c. Nearly all of the AMA club sites in district 1 in controlled airspace have gone through the SRM panel process with the AMA Gov. team, club officers, other stakeholders (AOPA, ALPA, Medical Heli etc.), and observers (AMA VP, AVPs).
- d. The panel members work on identifying hazards, assessing risks, and providing risk mitigations to lower risk to acceptable levels.

During 2021 and 2022, the SRM panels approved the higher altitudes that were requested for more than 350 AMA club's in the USA with maximum altitude limits that were well over FAA facility map altitudes and for some club flying sites up to 2,000 ft. AGL.

Clubs in Uncontrolled Airspace:

- a. In uncontrolled airspace AMA members at AMA sites are limited to the maximum altitude that members have always flown until notified otherwise by the AMA.
- b. It's FAA's intent to work with the AMA this year in developing a process that may of risk mitigations that may utilize a checklist or some type of waiver system for AMA club's whose sites are in uncontrolled airspace to request altitudes above the 400 ft. AGL regulations required in Class G airspace.

► CONTROLLED LOA OR SRMPP ► UNCONTROLLED SITE MAX ALT OR TBD

4. TRUST & Registration – Are AMA clubs required to enforce FAA UAS regulatory requirements that recreational remote pilots must have taken the FAA TRUST test and have registered with the FAA and affixed their registration numbers to the model aircraft they fly and if they don't, will members and clubs AMA liability insurance coverage be in jeopardy?

- a. The AMA's position on enforcing AMA members to take the FAA TRUST test and/or Registering as recreational operators with the FAA is to leave these types of decisions to the individual members or the club's to decide if they want to enforce compliance or not. AMA will continue to inform club's and members about the FAA TRUST test and Registration regulations but AMA will not be a law enforcement arm of the FAA for these types of non-safety regulations.
- b. AMA's insurance provider will honor club and member insurance claims whether a member took and passed an FAA TRUST or Registered as a recreational operator.

It's FAA's responsibility for enforcement. They may use local law enforcement or security partners to issue citations and fines for people who operate sUAS/model-aircraft in the National Airspace (NAS) while non-compliant with Federal laws.

► AMA NO LE ► LE CLUB DECISION ► LE FAA RESPSIBLTY ► AMA INSURACE HONORED

5. FRIA Sites – Is the FAA FRIA application process still expected to begin on September 16, 2022, and what is expected of AMA clubs in the process of requesting FRIA status?

- a. A FRIA is an FAA Recognized Identification Area that is a fixed flying site where a model-aircraft may be flown without having Remote-ID technology broadcasting capability.
- b. The FAA FRIA application process is still scheduled to begin on September 16, 2022 however, as it was originally August 26, 2022 with many of these FAA start dates its likely to get pushed ahead again another month.
- c. FAA will only accept applications from persons authorized by an FAA recognized CBO/AMA, or an Educational Institution. (CBO status delayed by 9157C). Once the person/club has AMA's authority they may fill out the application and then it must be submitted by the AMA to the FAA.

► **SEP 16 2022**

► **FIXED/DESIGNATED**

► **CBO AUTHORIZED SUBMITTED**

6. Remote-ID – When will Remote-ID broadcast modules be required for AMA pilots to continue flying model-aircraft at non-FRIA sites and what is the status of broadcast module development, testing, specification, and expected costs?

- a) The compliance date for Remote-ID broadcast module use is still September 16, 2023. Manufacturers of Standard UAS will need to comply on September 16, 2022.
- b) FAA UAS Remote-ID prototypes were last tested on Sept, 2020. The FAA acknowledged that prototype Remote-ID UAS using Bluetooth 4/5 chip technology broadcast modules, an Intel app, Samsung S10 cell or an iPad were able to detect and display the UAS's message elements at a range of 1.24 miles.
- c) FAA didn't tell developers minimum range requirements except to say, *"If you can see it you must be able to ID it"*. AMA views this as good news because 1 or 2 mile low range module will be more affordable and less likely to have their UAS ID data compromised.
- d) No further info/data has been published from any of our sources. We have had meeting with some developers and engineers but we felt they were focusing on long range units with costly features more suited for commercial applications.

► **PILOTS SEP 16 2023** ► **MFG SEP 16 2022** ► **TESTED 2020** ► **SEE IT ID IT** ► **RANGE 1-2 MILE**

7. Flying Site Assistance – AMA's most important product is AMA club flying sites...it's what drives membership. Does AMA leadership have any new flying site acquisition plans or initiatives under consideration for assisting clubs in identifying and securing flying sites?

- a) AMA is working on developing Club & Officer Toolkits to assist clubs and members in identifying, securing, and retaining flying sites.

The kits would contain training material and a variety of promotional media (videos, booklets, handouts, etc.) individually targeted to each potential flying site resource whether on public, private, commercial or educational institution properties demonstrating the values and benefits that AMA clubs, members, and aeromodelling sites may bring to a community.

- b) The statutory provision allowing educational institutions to conduct sUAS flying under CBO safety programming rules provides AMA with school partnership opportunities to focus on developing a range of sUAS curriculums, related kits, AMA youth competitions, RC pilot training, and to acquire new youth flying site locations on school properties.

▶ AMA'S PRODUCT FS ▶ TOOL KITS ID SECURE RETAIN FS ▶ EDU USE CBO RULES OPPO.