

AMA D1 NPRM REGISTRATION COMMENT

My name is Andy Argenio and I am writing today not as an Academy of Model Aeronautics Executive Board Member but as the Chairperson of AMA's Advanced Flight Systems Committee that's responsible for developing safety programming for new and emerging technologies and their utilization in model-aircraft. I am deeply concerned with the proposals in the FAA's NPRM for Remote-Identification (RID) with respect to the requirements for registering recreational UAS/model aircraft.

More specifically, with the need for each individual model-aircraft to be registered. This would impose significant costs on the recreational UAS model aviation community and place an undue burden on safe and responsible model aircraft hobbyists. Furthermore, if implemented as is, the requirement could deter compliance and therefore reduce the effectiveness of remote ID.

Individual UAS registration is a major issue for me and the recreational UAS model aviation community because of how many aircraft we own. On average, members of the Academy of Model Aeronautics (AMA) own nine aircraft each and some members own hundreds. Since we have so many model aircraft, many of them are flown infrequently – perhaps only a few times in the lifetime of the aircraft. And when we do fly an aircraft, it is always within visual line of sight, making it easy to identify the pilot at all times. Individual registration of recreational UAS may not accomplish what the FAA is intending.

Many operators of recreational UAS not only fly any one aircraft infrequently but also trade or sell aircraft often, so the requirement to register and deregister will become cumbersome. The current process would meet the FAA's stated needs by simply adding a requirement to the registration process that the owner provides a number of aircraft to be operated. The simple addition of a second block to be filled in (the first one is being added since the FAA has proposed to require a telephone number) would provide the FAA with a much more accurate number of UAS being operated in the US.

Another option would be to have all Standard Remote-ID and Limited Remote-ID hardware modules serial number and allow those number to be utilized since their serial numbers will be in the message elements that will be UAS broadcast and GCS network transmitted to the USS data handlers. The registered modules may be moved from one model aircraft to another saving the operator considerable costs on registration and even more in not having to have a RID module for every model aircraft.

If the proposal to register UAS individually goes into effect as is, AMA's 180,000 members would be forced to register about 1.62 million aircraft at a cost of \$8.1 million, assuming the \$5 per aircraft registration fee does not increase over time. This is clearly a substantial investment of time and resources for our community, which has already faced challenges in recent years due to increasing regulations.

In conclusion, I urge you to remove the proposed requirement to register each UAS individually. At a minimum, the requirement should be removed for members of a community-based organization like AMA who have operated safely in the airspace for more than eight decades and already register with their organization.