

Seeking Exemption from NPRM Remote-ID for model-aircraft flown at FRIA sites.

My name is Andy Argenio and I am writing today not as an Academy of Model Aeronautics (AMA) Executive Board Member but as the Chairperson of AMA's Advanced Flight Systems Committee (AFSC) that's responsible for developing safety programming for new and emerging technologies and their utilization in model-aircraft (MA). I am deeply concerned with proposals in the FAA's NPRM for Remote-Identification (RID) that would negatively impact our existing community of responsible and safe model aircraft hobbyist.

We recognizes and supports the need for RID to be incorporated into certain UAS for commercial and/or recreational use. We are disappointed that the FAA decided not to accept the recommendation from its UAS RID Aviation Rule Committee (ARC) to exempt UAS that operated in compliance with CFR part 101 or by AMA members.

Remote-ID should not be required for recreational UAS/model-aircraft that aren't capable of being navigated beyond-visual-line-of-sight (VLOS) of the operator.

NPRM aligns well for drones with BVLOS technology but not for model-aircraft without technology. After a thorough review of the NPRM, it was evident that the recommendations the ARC provided to the FAA were derived from current drone RID technology developed by companies like DJI. It's a well-known fact that 95% of the UAS/drones operating today already incorporate the technologies necessary for RID compliance. Unfortunately 90% of AMA members UAS/model-aircraft do not.

UAS RID ARC recommended exempting MA

Those members on the ARC who recommended that recreational UAS/model-aircraft should be exempted from complying with RID requirements clearly understood that rules developed for drones to fly BVLOS should not be adopted or required for UAS/model-aircraft designed to only be flown within VLOS. They realized that a "one-size-fits-all" rule for RID may for BVLOS UAS operations provide the desired safety and security needed to conduct commercial operations, but for recreational flying of UAS/model-aircraft that are technologically incapable and not permitted to be flown BVLOS, the requirement for RID would have a disastrous economic impact on the R/C industry and nearly all current and future recreational operators.

UAS RID ARC Law enforcement and commercial failed in being technology agnostic

Other members on the ARC who represented commercial and security/law-enforcement interests wanted all UAS to comply with RID in spite of the UAS/model-aircraft not being capable nor allowed to be flown BVLOS within AMA rules and current laws. They ignored the best practices in drafting rules of this type which requires being technology agnostic or essentially unbiased towards using or not using different technologies to solve different problems. UAS incapable of BVLOS flights that are flown at permitted locations have over 84 years of an exemplary safety records.

According to those in the opposition, "it's their fear that exemptions for a massive segment of UAS" could undermine the value of tracking for future UTM and jeopardize the safety of the airspace."

This fear no longer has any merit because today nearly every drone sold for recreational or commercial use is RID capable and can be in compliance. Those model airplanes and multirotor racing drones without the capability to fly BVLOS are **not a massive segment but a segment of less than 200,000 AMA members** who are not growing in size and have never posed safety or security risks at their permitted flying sights where they fly model aircraft not over people or structures within VLOS at FAA-approved altitudes. There isn't value in tracking these model aircraft since their flights only occur at designated locations within the VLOS of the operators. **The drone segment represents over 1,300,000 operators.**

FAA can and does provide different rules for different recreational full scale aviation

Some FAA personnel have at times said that they can't provide different rules for UAS recreational flight operations conducted by those who fly UAS/drones technology capable of flights BVLOS from those who fly model aircraft or drones that are not technology capable of flights BVLOS. We disagree, since the FAA has established different sets of rules in different classes of airspace for different types of full-scale aircraft such as paragliders, ultralights, hot air balloons, sport aviation, helicopters, transport aircraft, etc. So why not do the same for model aircraft?

The NPRM lacks any safety or security risk/threat assessment data to warrant such restrictive and unwarranted rules for UAS/model-aircraft that are not capable of BVLOS flights.

a) The NPRM mentions the 7,000 so-called drone **incident reports** which after analysis turned out to be nearly all legal sightings with only 3.4% being incidents. FAA's former Administrator, Michael Huerta, when questioned by Congress admitted that the **data wasn't accurately qualified or quantified**. The incidents and the 47 FAA prosecuted cases for illegal or reckless UAS/drone flying to date never involved any AMA members or model aircraft in spite of the fact that AMA members fly a total of over 30,000,000 flights/year at 2,400 flying sites in the USA and maintain an exemplary safety record recognized by the FAA, EAA, AOPA, NAA, and others.

b) **Has the FAA followed the Government's Office of Regulatory Affairs and the guidelines** for risk assessment, mitigation, and management? AMA and its members would like to be assured that professional standards have been maintained and the risk analysis was transparent and conducted appropriately since AMA's own analysis of risks of safety and security threats from AMA member flight operations of model aircraft continue to be at the lowest possible risk levels attainable.

We urge the FAA to consider revising the NPRM so as to exempt the Remote-ID requirements for model-aircraft and multi-rotor race drones that are not technology equipped for navigation beyond the visual line of sight of the operators and that are flown at FAA permitted flying sites. The cost and fees for complying with network and broadcast equipage along with cellular and USS data handler fees are overly burdensome and unwarranted especially since this community presents no safety or security threats/risks. We agree that some form of remote-ID should be required for all UAS/model-aircraft that are capable of being navigated beyond the visual line of sight of the operators.