AMA D1 NPRM EDUCATION 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 proposals in the FAA's NPRM for Remote-Identification (RID) with respect to how it would negatively impact educational efforts conducted by nearly every AMA club in the USA from K1 thru college as well as with our existing community of over 60,000 youth members.

There are no educational accommodations.
The FAA's proposal on Remote ID does not make any accommodations for education. In Section 350, Congress specifically calls for the FAA to create allowances for recreational UAS that are operated by an institution of higher education for educational purposes. In order to continue to instruct and train new generations, educational accommodations need to be made.

Model aviation holds a strong position in our nation's classrooms.
Model aviation is an effective tool for inspiring young people to explore careers in STEM-related fields. Building and flying model airplanes have long been a gateway to aviation for legions of aviators and engineers. Building and flying model aircraft are "hands-on" experiences to motivate and inspire a future generation of problem solvers and inventors, opening doors to careers in aviation and engineering.

In a time when our nation is experiencing a shortage of aviation professionals, we need to find ways to make flying model aircraft easy, not hinder the experience.
In order to fulfill future aviation roles, it is imperative to introduce newcomers to the exciting and engaging hobby of model aviation. We can accomplish this by making aeromodelling easily accessible to everyone without unnecessary restrictions.

The FAA's registration requirement and proposed Remote ID technology will hinder the ability of educators to share these experiences with their students.
The AMA currently has more than 50,000 members between the ages of 13 and 18 and more than 13,000 members under the age of 13. For these AMA Youth members and their families, the FAA's registration requirement and Remote ID technology could be a deal-breaker for continued participation in the hobby. The high costs and time commitment associated with a registration effort on this scale is insurmountable for many. The price of aircraft is already a potential burden, and adding in costly Remote ID technology in the manufacturing process will only exacerbate this problem. Model aviation has been and should continue to be available to all children, regardless of their socioeconomic status.

Fixed flying sites are not the only viable solution.
Our students learn and fly not only at school facilities such as gyms and school grounds outdoors but also at community parks and at home. Many of our kids don't have cell phones and

want to fly at locations that don't have Wi-Fi or mobile phone/data cellular service. Your proposal would severely limit those options and require expensive and burdensome restrictions that would disallow the model aviation activities while having no significant impact on the overall safety of the National Airspace System.
Although it is helpful that the proposal includes an option to comply with Remote ID by flying at an approved fixed site, it is concerning that the proposal limits the number of approved sites and prohibits the establishment of new sites. The rule appears designed to phase out these sites over time, rather than treat them as a viable long-term option for complying with Remote ID. Please consider viewing fixed flying sites as part of a viable long-term solution to Remote ID, and to amend the rule to allow for the establishment of new sites in the future.

Remote ID makes sense for autonomous flight operations.
In the case of fully autonomous UAS that are equipped to fly via GPS coordinates and waypoints with no continuous, positive input via a pilot, it makes sense to have Remote ID requirements. However, a UAS that requires continuous, positive input from a pilot to maintain its flight within line-of-sight should be exempted from requiring Remote ID.

The flight envelope needs to be expanded.
Unfortunately, a 400-foot altitude limit is too small a space to accommodate all of the model aviation activities our students require. We need an easy way to accommodate flights outside of the proposed 400-foot bubble or our educational opportunities will suffer.

Model aviation has been and continues to be a safe activity.
Since 1936, AMA members have been safely flying model aircraft. Our safety record is overwhelmingly positive. We have safety standards in place that allow us to operate safely and without incidents in the National Airspace System. By operating within the safety guidelines the AMA provides for its members, the skies have been and continue to be safe for all aviation activities.