

AMA D1 NPRM FPV COMMENTS

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 that the current proposal would impose significant costs and place an undue burden on those who fly first-person view (FPV) flying, especially for freestyle and racing events.

In my district (New England) we often have FPV pilots participate in our community outreach and charitable events where we are invited as airshow performers especial local airport aviation airshows. It's not uncommon for the FPV group to set-up safety netting around an entire race course so the public can get up-close to see these racing drones speed through gates and obstacles. Prevent them from having places to fly and you're losing the best resource for future commercial drone pilots. The FPV hobbyist are passionate and knowledgeable technologist who often design and build their drones developing multi-disciplinary engineering skills and are so willing to share that with young and old like me and I am 77 years young.

The proposed remote ID rule is a problem for the FPV community for two primary reasons. First, it essentially limits FPV flying to operating at FAA-identification sites only. This is especially troublesome for the many established FPV competitions and events which are not at these identification sites and often raise money for local charities. These established safe events will likely be canceled if the remote ID rule goes into effect as is.

Furthermore, I am concerned that the rule arbitrarily limits the number of approved sites and prohibits the establishment of new sites. As such, the rule appears designed to phase out these sites over time, further restricting FPV flying. I urge you to allow FPV flying at more locations than FAA-identification sites only.

Second, the limit on operating UAS "no more than 400 feet from the control station" is highly problematic for FPV flying, which is conducted at very low altitudes but farther horizontal distances from the operator. If implemented, this limit would drastically reduce the size and scope of FPV competitions and events which usually span a wider area. Again, these events are established and safe and I see no reason for them to be severely limited. I urge you to consider a pathway for FPV flying events to receive remote ID compliance at the location of the event, so the 400-foot limit would not apply and FPV flying could continue to occur.

Again, as currently written, the remote ID proposal is too rigid and overly burdensome for the FPV community. Please address these pressing issues so that our growing hobby can continue to flourish.