AMA D1 NPRM INTERNET 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 that the proposed requirement for model aircraft to transmit information via an internet connection would unnecessarily restrict safe and responsible model aircraft hobbyists, especially in rural areas.

To comply with a portion of the Remote ID NPRM, the proposed rule would require information to be transmitted via an internet connection. For individuals like myself, who have been flying model aircraft safely for 65 in rural areas with little or no internet service – this rule would effectively ground my ability to fly. While there is the option to comply with remote ID by flying at FAA-recognized identification areas, those areas are far away from me. And worse, the proposed rule is expressly designed to eliminate these areas over time. This means that even if I was willing and able to drive to a recognized identification area, I wouldn't be able to use that flying site to comply with remote ID over the long term.

Rural locations are frequently the safest places to fly because they are away from people, other aircraft and structures. I urge the FAA to amend the proposed rule as follows:

- Revise the manufacturing requirement for limited remote ID so that UAS can fly when there is no internet connection, as long as they are at an FAA-recognized identification area or use a software-based solution to mark the user's location.

- Provide an alternative to comply with remote ID when there is no internet connection and you are not in an FAA-recognized identification area. For example, one possible alternative would be to allow users to mark his or her location by using an app or website. The user's location and identification could be done hours or days in advance, similar to the feature on many LAANC apps.

- AMA members fly aircraft that require continual input and are only flown within line of sight. Advanced drones, on the other hand, with advanced capabilities to have sustained and controlled navigation beyond visual line of sight may need additional remote identification requirements. This distinction was also provided to the FAA by the Remote Identification and Tracking Aviation Rulemaking Committee, specifically Work Group Two, tasked to set a threshold of compliance.

I strongly urge you to address my concerns about the remote ID proposal. Model aviation is the natural precursor to careers in aviation, including commercial pilots and engineers and more – jobs which the U.S. desperately needs to fill. Model aviation supports a $1 billion hobby industry responsible for thousands of existing U.S. jobs. We simply cannot afford to further harm the model aviation hobby with overly burdensome requirements.