

LAST CHANCE TO SAVE THE HOBBY
We Need 25,000-plus AMA Member Comments
Posted at FAA Before March 2, 2020
FAA Proposed Remote ID Rules
Necessary for Some and Unacceptable for Others
NPRM COMMENTS & INSTRUCTIONS

Dear AMA Members,

On December 26, 2019, the FAA released its Notice of Proposed Rulemaking (NPRM) for Remote Identification (Remote ID) of UAS/model aircraft. If this rule is passed as written, it will mark the end of the hobby as we know it. The rule contains overly complex, over-burdensome, and unwarranted requirements and restrictions, which will dramatically affect 90% of AMA members who fly model aircraft/drones of all types that are not capable of being navigated beyond the visual line of sight (BVLOS) of the operators.

The rule intends to phase out Remote ID exemptions at AMA flying sites; obsolete current RC systems and replace them with expensive RC integrated technologies for any new model aircraft; limit the types of model aircraft that can be manufactured and sold in the USA; require some aircraft to be factory limited to a 400-foot flight range; require an FAA registration and fee for every model aircraft owned; no longer allow current RC systems to be utilized in new ARF models; restrict all model aircraft/drones not equipped with new FAA-compliant control systems to only be flown at FAA-approved sites, and much more.

In 2019, the FAA UAS Remote ID Aviation Rulemaking Committee (ARC) of 74 stakeholders from the aviation community, industry, commercial organizations, standards group, and law enforcement participated in researching existing and emerging technologies to identify and track UAS. The rules the committee presented to the FAA were specifically derived from the design and performance criteria acquired from UAS manufacturers, including DJI, that already utilized technologies for geo-fencing, identification, and tracking in the company's drones.

It should be noted that the FAA did mention in the NPRM that 95% of UAS/drones already have technology onboard to qualify for compliance with the Remote ID rule. Most agree that these UAS should operate under the proposed rule in order to enhance safety, security, and law enforcement to address illegal operations. However, most model airplanes and FPV multirotor racing drones with 25 MW video transmitters aren't capable of being flown BVLOS and therefore consideration should be given to exempt them from the Remote ID rule, especially ones that are flown at FAA-approved sites.

The ARC committee did recommend to the FAA that UAS/model aircraft without the capability of being navigated BVLOS should be exempted from Remote ID. The FAA said that it didn't pursue this option because it wouldn't meet the mission needs of the proposed rule for security, performance, and information quality. AMA members disagree. They have never posed a security risk at AMA flying sites because all clubs receive a warning from the AMA when TFRs are issued. There isn't any valid reason to track AMA flights at FAA-approved sites and a simple app as used for LAANC to notify that a member is flying should suffice for Remote ID compliance outside of approved sites. The flight performance of AMA model aircraft by members who altogether fly roughly 30,000,000 flight per year continues to have a demonstrated exemplary safety record.

Trying to apply rules that were developed for drones capable of BVLOS flight to model aircraft and drones that are not capable of such flights, would place a costly, unnecessary, and unwarranted burden on AMA members. Additionally, the rule would needlessly devalue and make obsolete large collections of model aircraft and RC systems that can't be used in newly purchased model aircraft unless they are amateur-built models.

In order to accommodate the many types and sizes of UAS/model aircraft flown, the average AMA club flying-site occupies a space of 1,500 to 2,000 feet in length and 600 feet in width. A slightly smaller space is needed

for a drone racecourse. Sites of this size are most often in rural and unobstructed locations that pose an extremely low model aircraft flying safety risks or hazards to people or property.

Drones that are already Remote ID capable pose a much higher risk because they don't need a flying site or runway and are often flown in urban and populated areas BVLOS by an operator who is alone, in which case the requirement for Remote ID is justified. Although there have been 48 FAA prosecutions for illegal flying, none involved AMA members, nor did any occur at AMA flying sites.

FAA has said that it can't provide different rules for UAS recreational flight operations conducted by those who fly drones capable of BVLOS from those who fly model aircraft or drones that are not capable of BVLOS. This response has never had much merit because 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?

FAA could expedite the NPRM Remote ID rule process much sooner if it didn't have to contend with the safe and responsible AMA fliers. AMA urges the FAA to provide an exemption from Remote ID for AMA members who fly any model aircraft or drone not capable of BVLOS flight, especially at AMA flying sites approved by the FAA and where the support system provided by AMA club safety officers, flight instructors, airplane airworthiness inspectors, and members, ensure compliance and enforcement of all AMA rules and FAA regulations and laws.

The FAA needs to offer waivers for flying at other than FAA FRIA sites by utilizing an app for notification approval or FAA waiver so those flying small model aircraft at local parks and schoolyards can get approval and clubs conducting air show events at locations such as airports can continue to do so.

This is not the final rule, but we need your help to ensure that our concerns are addressed in the ultimate regulation. To help, I urge you to submit a formal comment to the FAA. We encourage you to make your comments personal by highlighting your own concerns with the Remote ID rules and ask the FAA to address the issues you have. Tell the FAA how we will be impacted and emphasize that it cannot force us into a one-size-fits-all approach.

A number of templates with comments from AMA Headquarters and District I that you may consider for guidance when writing your comments are available in MSWord format.

[Click District 1 Templates Comments.](#)

For more information and template comments on the AMA website, please

[Click AMA Gov. Blog Templates Comments.](#)

Please Click Submit Formal FAA Comment to the FAA before the deadline on March 2, 2020.

Every voice matters in the fight to protect model aviation and hopefully prevent overly burdensome regulation. Please pass this message along to your friends and family and encourage them to submit a comment.

Thank you in advance for submitting a comment. We sincerely appreciate your hard work and support.

Best Regards,

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