May 9, 2007

Mr. Michael Cirillo
Vice President, System Operations Services
Federal Aviation Administration
800 Independence Avenue, SW
Room 1002W, ATO-R
Washington, DC 20591

RE: AOPA request for manned chase planes for Beale Unmanned Aircraft operations

Dear Mr. Cirillo:

The Aircraft Owners and Pilots Association (AOPA), on behalf of more than 411,000 members nationwide, opposes the use of temporary flight restrictions (TFRs) for unmanned aircraft (UA) operations. Most recently, the FAA approved the use of TFRs for UA operations from Beale Air Force Base (AFB) in Marysville, California, which AOPA opposed. AOPA recommends that the Federal Aviation Administration (FAA) suspend the use of TFRs and instead require the use of a chase plane at Beale and for all UA operations operated in civil airspace below 18,000 feet mean sea level (msl).

Using TFRs to segregate UA operations is in direct opposition to the FAA's "do no harm" policy for UA operations in the National Airspace System (NAS). This was illustrated last week by a near miss with a manned aircraft in the Beale TFR. The FAA must require that the Department of Defense (DOD) mitigate any safety or operational concerns associated with the Global Hawk operations at Beale AFB without creating additional flight restrictions.

As the Beale TFR incursion illustrates, reliance on TFRs to mitigate the safety and operational concerns associated with UA operations in the NAS is ineffective at best. The use of manned chase planes to accompany all UA operations below FL180 is the most efficient way to ensure safety.

In a recent AOPA survey, nearly 95% of our members told us that UA operations should follow the same operating rules as manned aircraft. They also overwhelmingly agreed that UA should not require restricted airspace and would prefer to integrate UA operations as long as UA have the ability to see and avoid manned aircraft, are able to immediately respond to ATC instructions, can demonstrate they are able to safely operate in the same airspace as manned aircraft and be certified to the same level as manned aircraft.

Mr. Michael Cirillo Page 2 May 9, 2007

Until the FAA is able to develop standards that promote the safe integration of UA operations in the NAS, the FAA must require that the DOD and other federal agencies use manned chase planes for UA operations in airspace shared with other civil aviation.

Sincerely,

Andrew V. Cebula

Executive Vice President

Government Affairs

cc: Fred Pease, Executive Director, DOD/Policy Board on Federal Aviation