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May 4, 2012

Docket Operations  
M-30; U.S. Department of Transportation  
1200 New Jersey Avenue SE.  
Room W-12-140, West Building Ground Floor  
Washington, DC 20590-0001

RE: Request for Comments on Unmanned Aircraft System Test Sites; Docket No. FAA-2012-0252

To Whom It May Concern;

The Aircraft Owners and Pilots Association (AOPA), on behalf of more than 400,000 general aviation pilots and members nationwide, offers the following input to the Federal Aviation Administration (FAA) regarding the Unmanned Aircraft System (UAS) test sites pilot project. AOPA supports the safe integration of UAS into the national airspace system. The UAS test sites required under the National Defense Authorization Act (NDAA) and the FAA Modernization and Reform Act of 2012 should allow the agency and the aviation industry to gather the needed data to build the safety case for integration of UAS while leveraging that data to ensure regulatory standards are developed to enable future integration of UAS where appropriate. It is critical the establishment of these UAS test sites is implemented without the creation of additional segregated or restricted airspace and there are no impacts to existing airspace users.

With regard to the questions posed in the Request for Comments, AOPA offers the following to several of the questions presented:

- The FAA must maintain airspace safety oversight. While the FAA designates other agencies such as the Department of Defense as an airspace coordinator or manager, most local governments and civil operators do not have the expertise or experience of managing airspace. It is concerning that the FAA would allow a local government or civil operator to manage airspace. AOPA strongly suggests the FAA delegate management of these test sites to only those agencies that currently have responsibility for managing airspace.
- The criteria established through the FAA Order, 8130.34B appears to adequately address the safety issues associated and should be used as guiding documents for those seeking to apply for a test site.
- With respect to the (D) (2) high speed flight testing, AOPA would offer that this activity would be best conducted within existing Restricted Areas or maybe Military Operating Areas depending on how "high" the speed may be.

- Also, in paragraph (G) the prohibitions in Code of Federal Aviation Regulations (FAR), Part 91.305 could be expanded to include no flight testing that affects visual flight rules (VFR) routes as described in the obstruction evaluation guidelines in FAA Order 7400.2 as these routes may have more than "light" traffic. The FAA may also consider adding these new routes to the FAA Order 8130.34B rather than going through the rulemaking process to revise Part 91.305 for UAS testing.
- Of great concern to AOPA is how the test site airspace will be defined and how the FAA will ensure the establishment of test sites "do no harm" to existing national airspace users. AOPA does not support the establishment of a new class or type of airspace created to allow for the safe integration of UAS or any other aircraft into the existing system. The very essence and intent of the legislation is to create an environment where UAS are "integrated" into the existing airspace so that the data gleaned from these specific areas can be leveraged for regulatory standards and future expansion of UAS integration. Some specific recommendations with regard to pilot education and charting of the test sites should consider only identifying the test ranges that would fall outside of existing Special Use Airspace and could be identified using the recently developed UAS charting symbol and perhaps Mean Sea Level (MSL) or Above Ground Level (AGL) heights. The FAA may want to consider including the specific description and graphic depiction of the range airspace along with other necessary information in the Airport Facility Directory (A/FD) supplemental information section. Further, the test range should be defined by latitude and longitude coordinates or radial and distance from a navigational aid – possibly both as appropriate. At a minimum, the FAA will want to include the operating community in efforts to educate existing airspace operators on the UAS test sites to ensure proper education and outreach accompanies their establishment.

AOPA would suggest the FAA utilize the expertise of the UAS Aviation Rulemaking Committee (ARC) to help the agency through the UAS test site designation process as the group includes participation from the Department of Defense, the National Aeronautics and Space Administration (NASA) – both listed as coordinating agencies in the legislation – as well as representatives from the operating community and the UAS industry. To the maximum extent possible, the UAS ARC should be kept informed and utilized for expertise and to assist the agency in developing UAS test site requirements, designation standards and oversight.

It would be extremely beneficial for the entire aviation community to learn from the data gathering the UAS test sites are being developed for. To date, the FAA has chosen to maintain a very close hold on the current UAS operations being conducting in the national airspace system. If the community is to learn from, collaborate, and build upon the data gleaned through the implementation of these test sites, there must be a process for sharing data with interested stakeholders and agencies.

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Considering many facets of implementation of the UAS test sites are unknown, it will be imperative the FAA continue to keep the aviation community and the public informed of the details of the test site designation and implementation process. Accordingly, airspace users and the public should have the opportunity to provide comment on that implementation plan and be able to engage the agency in meaningful dialogue in order to protect their interests.

AOPA appreciates the opportunity to provide input into the process of establishing these UAS test sites and looks forward to additional opportunities as the FAA develops an oversight and implementation plan for this pilot project.

Sincerely,

A handwritten signature in black ink, appearing to read "Heidi J. Williams". The signature is fluid and cursive, with a long horizontal stroke at the end.

Heidi J. Williams  
Vice President  
Air Traffic Services and Modernization