



## **CDA Concurrence to FAA Beyond Visual Line of Sight Aviation Rulemaking Committee Report**

The Commercial Drone Alliance, which served as a member of the FAA's Beyond Visual Line of Sight Aviation Rulemaking Committee (BVLOS ARC), submitted the following concurrence with exception to the BVLOS ARC Final Report:

The Commercial Drone Alliance believes this ARC report is a crucial first step for making aviation safer, creating the next generation of American aerospace jobs, restoring American leadership in the skies, and unlocking the countless public benefits of BVLOS UAS operations.

Unlocking the BVLOS marketplace will advance progress toward sustainable transportation infrastructure, carbon emission reduction, job creation, equitable access to medicines and vaccines, safer and more effective critical infrastructure inspection, emergency response, aerospace jobs creation, and domestic manufacturing.

The industry is at a point where UAS companies are ready to operationalize and scale in the U.S., as they are scaling around the world. In this country, however, policy has lagged behind technology and integration efforts have lagged behind the pace of innovation, in large part due to the limitations of the regulatory framework and the federal bureaucracy's struggle to move nimbly.

While there has been some improvement over the years, many of the federal government's policies, procedures, and processes have failed to adapt to and embrace an emerging industry. Instead, the federal government continues to hold back the UAS industry by unnecessarily applying incongruous standards and approaches designed for crewed aircraft. This mismatch results in disjointed regulation that suppresses the industry's progress by making it too slow and too difficult to secure the necessary approvals.

This report contains critical expert recommendations, advice, and information that the FAA needs to safely and effectively update its regulatory framework and normalize safe, scalable, and economically viable advanced aircraft operations in the United States. While it is an important step, the report is only a step; the key is that the FAA must now expeditiously implement this set of recommendations and build upon them.

While we appreciate the diligent work of this ARC, and we recognize that this report represents a compromise agreement between various stakeholders, we do wish the ARC had gone further in setting timelines and deadlines for the federal government to meet in implementing the report's recommendations. UAS integration has been a work in progress over the last decade, and with every passing day, the U.S. is falling further behind our international peers in aviation innovation.

CDA also believes that while network remote identification is not mandatory, it should be allowed as a substitute form of remote identification. While we believe this was the consensus view of the ARC, we worry that the language used to communicate this concept was not made clear in the final report. (See line 2106 of the report, which we believe should delete the words "to supplement broadcast remote ID for" so it would read: "While network remote ID is not a condition precedent for UTM operations, the FAA should explore additional identification solutions for UAS BVLOS operations.")

CDA looks forward to continuing to work with all stakeholders – federal government, civil society organizations, industry, states, localities and others – to make safe, secure, routine BVLOS operations a reality in the United States, for the benefit of all Americans.