



April 8, 2022

U.S. Department of Transportation
1200 New Jersey Avenue SE
West Building, Ground Floor (W12-140)
Washington, DC 20590

**Re: Non-Traditional and Emerging Transportation Technology Council; Request for Comment
(Docket No. DOT-OST-2022-0016)**

To Whom It May Concern:

The Commercial Drone Alliance (CDA) submits these comments in response to the request of the Department of Transportation (DOT) for comments on projects, issues, or topics that DOT should consider through the Non-Traditional and Emerging Transportation Technology (NETT) Council.¹ The CDA is an industry-led non-profit association representing commercial drone end users and the broader commercial drone and Advanced Air Mobility (AAM) ecosystem.² The CDA aims to help reduce barriers to enable the emergence of uncrewed aircraft systems (UAS or drones) and to work with the federal government and other stakeholders to facilitate UAS integration into the National Airspace System (NAS) safely and securely.

Congress has sought to integrate UAS into the NAS for over a decade, recognizing that UAS can provide countless public benefits and essential services to the American public. Around the world, advances in hardware and information technology have prompted a UAS revolution, with drones as vital tools that create jobs, protect workers and the environment, inspect critical infrastructure, expand equitable and efficient access to medicines, generate tremendous economic value, and enhance public safety. As the CDA has written elsewhere³, the benefits of UAS align with Biden-Harris policy priorities and DOT's strategic goals of Safety, Economic Strength & Global Competitiveness, Equity, Climate & Sustainability, and Transformation.⁴

The use of zero-emission UAS to save lives, provide rural medical access, and maintain our nation's aging infrastructure has been a bipartisan policy priority since 2012, when Congress first directed the Federal Aviation Administration (FAA) to integrate UAS into the NAS. The policy framework necessary to integrate UAS into the NAS has lagged behind the pace of technology innovation, however. The UAS industry continues to be held back by the application of incongruous approaches designed for crewed aircraft, suppressing the industry's progress by making it too slow and too difficult to secure the necessary approvals. As a result, industry and the

¹ 87 Fed. Reg. 13368 (March 9, 2022).

² For more information on CDA, please see www.commercialdronealliance.org.

³ See "Comments of Commercial Drone Alliance on USDOT Strategic Plan," December 2021 (found at <https://www.commercialdronealliance.org/letters-comments/2022-jan-comments-of-commercial-drone-alliance-on-us-dot-strategic-plan-docket>).

⁴ 86 Fed. Reg. 68720 (December 3, 2021).

American people are left with the status quo: less efficient, less safe, and less environmentally friendly methods of performing everyday tasks ranging from package delivery to critical infrastructure inspections.

The CDA supports the Council's mission to reduce, to the maximum extent practicable, impediments to the prompt and safe deployment of new and innovative transportation technology, including UAS and AAM technologies, particularly with respect to safety oversight and environmental review, as well as the Council's efforts to engage with stakeholders in nontraditional and emerging transportation technology ecosystems. Industry has much to offer in this joint effort to open the UAS/AAM fields safely and securely, and the U.S. Government should continue to work collaboratively with industry on this critically important effort.

The CDA urges the DOT to engage at an executive level to ensure the integration of UAS and other emerging aviation technologies moves forward in a timely way. Executive leadership is vital to securing U.S. dominance in a new era of aviation, an era which will be defined by uncrewed and, increasingly, autonomy-enabled operations.⁵ The NETT Council is one potential vehicle for DOT leadership.

The CDA believes the NETT Council could provide valuable leadership on topics including intermodal risk analysis, which (as discussed in the recent Beyond Visual Line of Sight Aviation Rulemaking Committee Report) is necessary to ensure America's transportation system enables the safest and most efficient modes of transportation for society as a whole. This means, for example, that the FAA should consider the benefits of UAS operations alongside the risks and benefits of more traditional transportation modes.

On this topic and more, the CDA is eager to work with the Council to move UAS integration forward. Over the last several years, the CDA has collaborated with the federal government, including the DOT, on many issues related to UAS and integrating UAS into the NAS safely and securely. The CDA urges the NETT Council to substantively engage with industry stakeholders working to develop and deploy emerging technologies like UAS and AAM. The CDA looks forward to continuing its collaborative efforts with the U.S. Government and to future engagement with the DOT and the NETT Council to support the development of a flexible regulatory regime that will allow safe, scalable, expanded UAS operations to become a reality.

Thank you for your consideration of these comments.

Sincerely,



Lisa Ellman
Executive Director, Commercial Drone Alliance

⁵ See CDA Letter to White House Presidential Personnel Office and Department of Transportation regarding FAA Administrator nomination, March 1, 2022 (found at <https://www.commercialdronealliance.org/letters-comments/letter-to-ppo-and-dot-regarding-faa-administrator>).