Welcome and thank you for joining us for today's Aviation Webinar Series. Our topic is “Remote ID Rule: Approaching the Endgame!” We have just a few announcements before we get started.

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Remote ID Rule: Approaching the Endgame!

What was the Public Reaction and How Will it Shape the Final Rule

Aviation Webinar Series
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Presented By

Mark A. Dombroff
Partner, Fox Rothschild LLP
mdombroff@foxrothschild.com
Phone: (703) 248-7002

Mark McKinnon
Partner, Fox Rothschild LLP
mmckinnon@foxrothschild.com
Phone: (202) 794-1214
Remote ID NPRM – Where are we Now?

- Published in the Federal Register on December 31, 2019
- FAA Docket No. FAA-2019-1100
- FAA denied multiple requests to extend the comment period
- Notice and Comment period closed March 2, 2020
- On March 1, 2020 there were 44,000 comments submitted
- On the last day, 9,000 comments were submitted
- Total number of Comments received was 53,113.
How does it compare with other rulemakings?

• Type of Certification of Unmanned Aircraft Systems NPRM (closes today)
  – 44 comments.
• Operation of Small Unmanned Aircraft Systems over People (Closed April 15, 2019)
  – 949 comments
• Safe and Secure Operations of Small Unmanned Aircraft Systems (ANPRM Closed April 15, 2019)
  – 1,842 comments
• Service Animal NPRM (Closes in a month)
  – 2,866 comments
• Operation and Certification of Small Unmanned Aircraft Systems (Part 107 rulemaking)
  – 4,671 comments
• Interpretation of the Special Rule for Model Aircraft (June 25, 2014 - Withdrawn April 11, 2019)
  – 33,849 comments
AMA Approach to mobilizing comments

• AMA Comment (16 pages)
  – No distinction between VLOS and BVLOS
  – Traditional model aircraft are operated differently from modern quadcopter
  – Lack of a clear risk assessment for different types of aircraft invalidates the rulemaking
  – FAA underestimates the costs of compliance for hobbyists
  – Risk/Benefit analysis is flawed
  – Operations at a FRIA eliminate the need for remote identification
  – FRIA creation and renewal process is too limited
  – Registration changes are more costly than estimated and unnecessary for most model aircraft
  – Internet connectivity a problem in remote areas
  – Amateur-built aircraft should include all kit builds
  – Want a 10 year implementation period (ADS-B had 10 year implementation)
  – Special approval for events and competitions
  – Privacy is not sufficiently addressed

• Comments referencing the Academy of Model Aeronautics – 19,613
Form Comments

• Template Comment on UAS Remote ID: 6,154
• Template Comment on UAS Remote ID: Registration – 1,018
• Template Comment on UAS Remote ID: Amateur-Built Aircraft – 1,016
• Template Comment on UAS Remote ID: Education – 417
• Template Comment on UAS Remote ID: Internet Connectivity – 399
• Template Comment on UAS Remote ID: FPV – 398
• Template Comment on UAS Remote ID: Law Enforcement – 45
DJI Approach to Mobilizing Comments

- **You Can Make a Difference**
- **Consult Resources and Colleagues Online**
- **A Short List of Steps**
  - Below are our own tips and suggestions for how to write and file your own effective comment. To summarize, your comment should at a minimum cover these things:
    - Who are you and what do you do (or want to do) with drones?
    - How are you impacted, and by which requirements or restrictions? Be specific.
    - What’s a better or less burdensome way to achieve the same goal?
    - Answer the FAA’s specific questions that affect you.
    - Don’t forget to comment on the aspects you support.
- **Start Your Comment by Telling the FAA About Yourself and Your Use of Drones**
- **Explain the Impact of the Proposal on You**
- **Take Time to Understand the FAA’s Goals, and Propose Better Solutions**
- **Look for the FAA’s Direct Questions to You**
- **Don’t Forget to Support Things You Like**
FPV Freedom Coalition Approach to Mobilizing Comments

- 750 comments submitted
- Individuals filed comments addressing their own concerns
- Attached FPV Freedom Coalition Organizational comments
- FPV Freedom Coalition comments 24 pages in length
- Addresses each FAA Question
- Comments on each rule
- Strong opposition to internet connectivity
General Comments about the FAA’s Approach to the Remote ID Problem

• Citations to National Academies of Science and Engineering report into UAS integration claiming FAA is too risk averse

• Rejection of ARC recommendations

• FAA favoring big business interests over the common man and small business community

• Criminals and terrorists will simply use a fake ID/registration
ARC Report

• 5,468 comments reference the 2017 ARC Report
• Claim deviation from ARC recommendations not warranted
• ARC proposal would have accomplished same result at lower costs
• ARC proposal permitted a path forward for hobbyists and legacy aircraft
Internet

• About 14,000 comments addressed Internet connectivity issues
  – Ability to connect in rural areas
  – Ability to operate in an internet denied area after a disaster
  – Indoor operations affected by the manufacturing requirements
  – Fixed sites should not need an internet connection
  – Safest places to fly often have no connection
  – Traditional model aircraft don’t have the electrical system to support internet connection
Privacy

• About 11,000 comments addressed privacy issues
  – Personally identifiable information collected by USS
  – How much data will non-governmental entities be able to access
    • License Plate Analogy and risk of harassment
  – Access by state and local law enforcement
    • 4th Amendment
    • Tracking of individuals
  – Overall, the availability of the session ID seems to have kept the concerns to a minimum.
FRIA

• About 10,000 comments addressed operations in approved Identification Areas
  – Commercial operators generally open to FRIA, do not see them as an obstacle to more complex flights and BVLOS
  – Not widespread support among commercial operators for proposed phase out of FRIAs
  – Current recognized club sites should be grandfathered
  – Approval should last longer (10 years common theme)
  – Registration, internet and broadcast requirements should be relaxed or removed in these areas
Registration

• 12,500 comments
• FAA understates the cost of compliance
• Individual registration is not required for hobbyists because they are not operating more than one aircraft at a time
• Individual registration unnecessary for operation at a FRIA
• Phony registration and Real ID issues with registration
Limited Remote ID

• 5,800 comments addressed the issue specifically
• 400’ set-off range is too restrictive
• Productive work requires greater separation from the aircraft
• Preference for broadcast instead of internet connection
GPS and Indoor Operations

• 4,300 comments address GPS issues

• Manufacturer’s requirements spill over into UAS operations not covered by FAA rules

• Most UAS meeting the requirements won’t be capable of operating in a GPS denied environment

• Many model aircraft do not have GPS equipment
Operation by Public Entities

• First responders and government entities need more flexibility in their aircraft and how they fly
  – GPS denied areas
  – Internet denied areas

• Additional security concerns with third parties knowing location of responders or responder aircraft

• “Public Aircraft Lite” option
UAS Service Suppliers

- 1,500 comments
- Criticize lack of detail in selection process
- Lack of detail in privacy protections
- Stronger protection for dissemination of flight information and commercially valuable information
- Request for a public option
ADS-B

• 1,480 comments
• About half advocate use of ADS-B as a remote ID solution
• Proposal for a UAS specific ADS-B solution
• Request for more flexibility for ADS-B use in larger UAS or UAS operating outside Class G airspace
Means of Compliance

- 850 comments
- Asking for FAA to accept industry consensus standards
- ASTM standards
- Coordination with EASA and other international organizations
- Longer phase-in for requirements
- Burden shifting of compliance from operators to manufacturers by placing limits on what can be sold
Manned Aircraft – A4A

- Apply to all UAS, regardless of size or purpose of flight;
- Provide data on UAS operations to the FAA’s air traffic management (ATM) system and be available for other NAS users;
- Allow the identification and locating of UAS and UAS ground stations at all times;
- Protect against deactivation of the Remote ID system;
- Be performance-based;
- Cover operations no later than 2-years after the final rule issuance date;
- Establish a prohibition from interfering with existing electronic surveillance technologies used for manned aircraft;
- Maintain airspace priorities on a risk-based basis, giving manned aircraft the right-of-way;
- State that the operating rules do not change for UAS under the Remote ID;
- Enhance security by limiting the protections for UAS operator privacy;
- Ensure transparency by mandating the registration, marking, and serial number requirements to facilitate identification before and after an accident; and
- Create a fee mechanism for UAS to support the cost the operations are imposing on FAA for services.
Industry groups - AUVSI

• Three Years Is a Reasonable Time for Mandatory Implementation
• The FAA should set performance requirements, rather than specifying particular solutions for remote ID compliance.
• FAA should help create an international standard
• Means of Compliance should be based on the specific CONOP
• Broadly Supports Making Operator Location Publicly Accessible, but the FAA Should Protect Confidential Information
• The FAA Should Also Emphasize that Interfering with UAS Operators Is Dangerous and Unlawful.
• Urges the FAA to Avoid Becoming Entangled in Issues of Spectrum Management
• The FAA Should Recognize Clear Encryption and Tamper Resistance Standards as a Baseline for Compliance
• The FAA Should Allow Community-Based Organizations to Apply for, and Renew, FAA-Recognized Identification Areas Beyond 12 Months
• The Responsibility for the Preparation and Execution of a UA Flight Should Remain with the Pilot in Command, and not a Take-Off Lock
• The FAA Should Provide More Information Regarding Its Rationale for Mandating the Provision of a Control Station’s Barometric Pressure Altitude
Invective comments

• Ridiculous 1,365
• Stupid 641
• Idiot 370
• Expletive 227
• Dumb 140
• Screw 119
• Foolish 109
• Crap 106
• Fools 92
• Idiotic 46
• Moron 38
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Save the Date for the 2021 Aviation Symposium
February 2-4, 2020
The Ritz-Carlton Tysons Corner
McLean, VA 22102
Thank You

If you have any questions, please contact us:

**Mark A. Dombroff**  
Fox Rothschild LLP  
8300 Greensboro drive, Suite 1000  
McLean, VA 22102  
mdombroff@foxrothschild.com  
Phone: (703) 248-7002

**Mark McKinnon**  
Fox Rothschild LLP  
1030 15th St. NW, Suite 380  
Washington, DC 20005  
mmckinnon@foxrothschild.com  
Phone: (202) 794-1214