



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

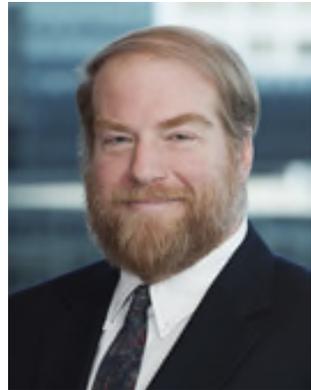
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# Presented By



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# 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.



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# 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- Interpretation of the Special Rule for Model Aircraft (June 25, 2014 - Withdrawn April 11, 2019)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](#)



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# 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



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# 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



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# 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**



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# 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



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# 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



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# 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



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# 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



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# 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
    - 4<sup>th</sup> Amendment
    - Tracking of individuals
  - Overall, the availability of the session ID seems to have kept the concerns to a minimum.



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# 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



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# 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



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# 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



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# 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



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# 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



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# 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



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# 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



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# 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



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# 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.



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# Industry groups - AUVSI

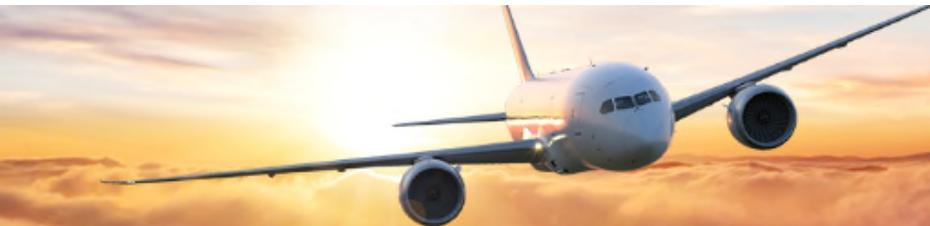
- Three Years Is a Reasonable Time for Mandatory Implementation
- The FAA should set performance requirements, rather than specifying particular solutions for remote ID compliance.
- FAA should help create an international standard
- Means of Compliance should be based on the specific CONOP
- Broadly 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



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# 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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# Thank You

If you have any questions, please contact us:

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