



THE FUTURE OF POSSIBLE

April 25, 2018

The Honorable Bill Shuster
Chairman
House Transportation & Infrastructure Committee
2165 Rayburn House Office Building
Washington, DC 20515

The Honorable Peter DeFazio
Ranking Member
House Transportation & Infrastructure Committee
2164 Rayburn House Office Building
Washington, DC 20515

Dear Chairman Shuster and Ranking Member DeFazio:

On behalf of DJI, we write to offer our comments on the FAA Reauthorization Act of 2018 (H.R. 4; the "Act"). As the world's leading manufacturer of small unmanned aircraft systems ("UAS"), we applaud the forward-thinking approach reflected by the legislation's UAS title. We are particularly pleased by your efforts to create a risk-based regulatory framework for "micro" UAS weighing less than 4.4 pounds. This approach would promote free and open innovation by entrepreneurs who are using UAS to take U.S. economic and employment growth to new heights.

We also want to take this opportunity to communicate our position on two key UAS policy issues that are implicated by proposed amendments to the Act. These are areas where an unduly restrictive regulatory approach could limit U.S. leadership in this emerging industry. We urge your attention to these matters as consideration of the Act moves forward:

- **A Simple and Straightforward Regulatory Framework for Recreational UAS:** As the number of drones used for recreational purposes continues to rise, there is growing interest in revisiting the special rule for model aircraft under section 336 of the 2012 FAA law. Any regulatory framework in this area should reflect the important distinctions in the user community, safety risks, and operational use cases between recreational and commercial UAS. The consumer market needs a framework that enables broad access to the many safe educational, artistic, and creative uses for this technology, and cultivates a safety culture of compliance based on rules that recreational and hobby users can easily understand. Consumers strive for compliance when rules are clear and easy-to-follow; overly burdensome requirements create high barriers for low-risk users, increasing the potential for non-compliance. As an example of this safety-first, consumer-oriented approach, any aeronautical knowledge standards for recreational UAS should focus on the primary rules necessary for safe operations and be conveyed in a readily accessible and efficient manner that facilitates consumer participation and adherence. Specifically, the amendment offered by Reps. Sanford (R-SC) and Davis (R-IL) sets a reasonable regulatory path for recreational and educational UAS operators and a responsible path for compliance that will increase the safety of our national airspace
- **Regulatory Roles and Responsibilities:** DJI supports provisions aimed at avoiding a "patchwork quilt" of inconsistent federal, state, and local UAS regulations. The FAA has said that regulatory inconsistency raises substantial safety concerns; it also impedes innovation and makes it virtually impossible for us and our colleagues in the industry to communicate what the rules are to our end-users. Allowing jurisdictions to broadly set time, place, and manner restrictions for UAS operations would compound this problem and severely complicate safety compliance when simple and straightforward rules are what's truly needed to foster a safe operating environment for drones. The Department of Transportation's UAS Integration Pilot Program will facilitate further exploration of these issues and lead to a greater understanding of innovative solutions. Any policymaking in this area should be informed by the data and



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experience that are gathered as part of this initiative, and not rush to judgment before having all the facts.

The continued development and expansion of the UAS industry in the U.S. is helping to drive the creation of tens of thousands of new jobs for Americans and inject billions into our economy. We are confident that the Act can set the stage for the next chapter of this success story.

Thank you for your consideration of our views. We would be happy to expand on the items discussed above or discuss additional perspectives on UAS legislation, at your convenience. We appreciate the opportunity to work with you and your staff and look forward to continuing to work together.

Sincerely,

A handwritten signature in blue ink that reads "Brendan Schulman".

Brendan Schulman
Vice President of Policy & Legal Affairs

A handwritten signature in black ink that reads "Eric Ebenstein".

Eric Ebenstein
Head of North America Public Policy

cc: U.S. House of Representatives

For more information on how DJI is enabling innovators to realize the potential of unmanned aerial technology, please visit www.DJI.com