

02 April 2024

Michael DiPilato, Airport Research Specialist
FAA Airport Technology Research & Development Branch (ANG-E26),
FAA William J. Hughes Technical Center, Bldg. 301
Atlantic City, NJ 08405

Re: Requests for Comments; Clearance of a New Approval of Information Collection: Unmanned Aircraft System (UAS) Integration at Airports and Necessary Planning, Design, and Physical Infrastructure Needs, Docket No. FAA-2024-0189

Dear Mr. DiPilato,

On behalf of the 4000-plus members of Vertical Aviation International, I thank the Federal Aviation Administration for the opportunity to provide comments related to on-going and future research efforts for Unmanned Aircraft Systems (UAS) integration and the associated infrastructure requirements.

VAI is the professional trade association for the international vertical flight industry and represents more than 1,100 global companies and over 16,000 industry professionals in more than 65 countries. VAI is dedicated to the promotion of vertical aviation as a safe, effective method of commerce and to the advancement of the international community, both manned and unmanned. Within the aviation industry, VAI is unique in that it represents all segments of the vertical aviation community including sUAS/UAS operators, legacy helicopter operators, next generation aircraft operators, and all associated manufacturers and service providers.

VAI also represents the segment of the aviation industry most affected by UAS integration, as manned vertical aviation operations occur at the same low altitudes used by UAS. In the U.S., our members carry out tens of thousands of sorties annually in the airspace below 400 feet AGL, conducting a wide range of time-critical missions that provide important societal benefits. We fully agree that this is a critical area for study and data-gathering.

As such, VAI fully supports the FAA's research efforts described in Docket No. FAA-2024-0189. We agree that it is essential for the FAA to have a complete understanding of the environment and operations which occur in the subject airspace. Only with input from the full scope of stakeholders can the FAA make the informed decisions necessary to develop future regulations, guidance, and standards related to UAS and UAS infrastructure.

We also strongly recommend the FAA finalize a definition for "droneport," and agree this data collection effort could be an effective means to address that objective. Establishing a foundational definition for droneports is essential to the overarching integration effort, as it will help facilitate associated requisites including such things as performance-based design standards, charting/siting, safety systems, and the full array of issues related to safe interactions with other airspace users.

Finally, VAI would recommend the FAA not primarily focus on aircraft weighing 55 pounds or more, but, instead, focus on the scope of operations; regardless of aircraft weight. Depending on the type of commercial operation, we can reasonably predict that fleets of unmanned aircraft that weigh less than 55 pounds will be in use. These fleets will need droneports and, as such, should be covered by this study.

I again thank you for the opportunity to provide comment. VAI is prepared to collaborate with the FAA in this effort. Because our membership spans nearly all stakeholder groups that the FAA is considering for interviews, VAI would be in a strong position to assist in facilitating data gathering.

My point of contact for this is Chris Martino, VAI Senior Director of Operations. He can be reached at chrism@verticalavi.org.

I thank you for your attention on this issue.

Sincerely,

A handwritten signature in blue ink that reads "James A. Viola". The signature is fluid and cursive, with the first name "James" being more prominent.

James A. Viola
President & CEO
Vertical Aviation International