



AIR LINE PILOTS ASSOCIATION, INTERNATIONAL

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April 02, 2024

Mr. Michael DiPilato
Airport Research Specialist
Federal Aviation Administration
Airport Technology Research and Development Branch (ANG-E26)
William J. Hughes Technical Center, Bldg. 301 (FAA Hangar)
Atlantic City, NJ 08405

Re: Docket No.: FAA-2024-0189; Agency Information Collection Activities: 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.

Dear Mr. DiPilato:

The Air Line Pilots Association, International (ALPA), represents and advocates for more than 77,000 pilots at 43 U.S. and Canadian airlines, making it the world's largest airline pilot union. Through unbiased fact-based evaluation of airline safety and security issues, ALPA works to ensure that the airline industry remains safe. ALPA's long-held position is that all operations in the National Airspace System (NAS) must be conducted to the highest level of safety and that it does not reduce the level of safety of other NAS users, including airline operations.

ALPA has reviewed the information contained in the Federal Aviation Administration (FAA) docket FAA-2024-0189, which is a Notice and Request for Comments for an Agency Information Collection Activity for the Clearance of a New Approval of Information Collection: Unmanned Aircraft System (UAS) Integration at/on Airports and Necessary Planning, Design and Physical Infrastructure Needs. The FAA has invited public comments for approval to renew an information collection.

ALPA understands that the information collection activity involves conducting research in the form of interviews with aviation stakeholders, airport/droneport operators, private entities, original equipment manufacturers, unmanned aircraft system (UAS) industry vendors, academia, representatives of the military, aviation stakeholders, etc.) to catalog current and planned droneport planning, design, and infrastructure needs, as well as find out which airports are integrating UAS into the airport environment.

ALPA supports the FAA in its request for collecting information for Unmanned Aircraft System (UAS) integration at airports in order to catalog current and planned droneport planning, design, and infrastructure needs, as well as find out which airports are integrating UAS into the airport environment. ALPA believes this is an integral safety component to enabling normalized UAS operations in the National Airspace System (NAS). This is essential to the safety of the NAS, commercial airliners, and the public are protected to the highest level of safety.

ALPA is in support of the Request for Research by the FAA to conduct interviews with stakeholders in the form of in-person and virtual meetings with representatives from ALPA and other organizations: airports, droneports, private entities, original equipment manufacturers, UAS industry vendors, the military,

international aviation community, and academia to discuss the unique requirements to the integration of UAS and droneports into the NAS.

ALPA requests to participate in the FAA's interviews with stakeholders in person or virtual meetings.

ALPA recommendation:

In addition to our support for the information collection activities, ALPA offers the following recommendations to the FAA, for consideration:

- The FAA should establish and host a database where de-identified data collected from this information collection activity can be used as a source of information to improve safety. The database can use the information that is collected from airports, vertiports, and droneports in the NAS with UAS operations. The establishment of this database would increase the FAA's ability to analyze information across the NAS such as high-volume traffic airspace areas and potential trend events. While ALPA is supportive of the creation of the de-identified database for monitoring NAS safety and security, ALPA is not recommending a punishment-based corrective action program. Instead, ALPA is suggesting that a database is the first step that the FAA needs to take to raise awareness of the increased risks associated with high-volume drone operations in the NAS.
- The FAA's information collection activities should document the varied and diverse use cases for UAS (drones) for operations on public airports, including Part 139 airports, as well as private airports and or droneport. This should include several major airports and associated droneports / vertiports large metroplex areas such as Chicago, Los Angeles, and New York. In addition, data collection of drone operations in the vicinity of large-scale all-cargo operations would be extremely valuable. All of these types of facilities provide potentially desirable locations for initial operations, but not all of them may be suitable for safe integration at airports. The information collection should also consider and take note of the different types of aircraft (i.e., small UAS (sUAS, under 55Lbs., Powered -Lift, Airplane, and or Rotorcraft) that will be operating at the airports and droneports.
- Many of the new aircraft propose to be powered by hydrogen, electric and or various hybrid systems that utilize current aviation fuels. Therefore, the FAA should collect information on whether changes to Airport Rescue and Fire Fighting (ARFF) tactics are necessary. The FAA should also collect information on whether changes to the volume of resources (personnel and equipment) are necessary.
- Further data collection is needed to assess adequate and dependable electrical grid connectivity and capacity capable of supporting the charging demands of electric drones and/or AAM vehicles without negatively impacting the airport and its critical electrical infrastructure. Unreliable power could affect Air Traffic Control (ATC) communications, navigation and surveillance systems used for safety-of-life operations.
- Wake Turbulence can have a pronounced effect on the safety of other aircraft operations even during ground operations. The FAA should collect information on the effect of traditional aircraft wake turbulence on UAS/drones that are conducting operations in close proximity.

In summary, ALPA looks forward to being part of the FAA's planned data collection activity regarding droneport planning, design, and infrastructure needs. We are interested in finding out which airports are

integrating UAS into the airport environment as well as finding out which airports are integrating UAS into the NAS. Additionally, ALPA believes that it is important that the FAA continue its data collection of airports that have UAS operations on them and how that UAS is being utilized. ALPA appreciates the opportunity to comment on the subject document.

If you have any questions, please do not hesitate to contact Mark Reed, Engineering and Air Safety, at 703-689-2270 or at Mark.Reed@alpa.org.

Sincerely,

A handwritten signature in cursive script that reads "Jeffrey Sedin".

Chair - Airport Ground Environment
Airline Pilots Association, Int'l