

April 2, 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:

I am the CEO of Praxis Aerospace Concepts Cluster (PACI), a collective of Service-Disabled Veteran-Owned Small Businesses based in southern Nevada. My work centers around developing practical solutions for multi-modal response robot systems and integrated critical infrastructures, encompassing ground, air, sea, and industrial applications.

It is a privilege to submit my insights on this docket. To lend credibility to my remarks, I bring over 22 years of experience in the UAS industry, recognized as an expert in both aviation and UAS domains. My qualifications include a commercial rotorcraft license with an instrument rating, a remote pilot certificate, and a restricted radio telephone operator's certificate. Additionally, my background encompasses a range of military remote piloting credentials, culminating in my retirement in 2012.

Over the past eight years, I have been actively engaged in the civilian Unmanned Aircraft Systems (UAS), UTM, and aviation infrastructure sectors, managing several airport facilities in southern Nevada and Central New York. My career in airport management spans over a decade, with experience across facilities in Louisiana, Nevada, and Germany. Notably, from 2017 to 2022, I held the position of Airport Manager at Searchlight Airpark in Nevada, a pioneering public-use privately-owned airport dedicated to UAS operations.

PACI agrees with the FAA's need to gather information on how airports are integrating UAS, or drones, and what their current and future needs are for drone planning, design, and infrastructure. PACI thinks this is a key safety factor for making UAS operations in the NAS normal. This is essential for the safety of the NAS, commercial rotorcraft, and the public.

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

PACI strongly recommends that the FAA broaden its scope to specifically include professional operators of small Unmanned Aircraft Systems (sUAS), those weighing under 55 pounds as defined by the FAA and Public Law. This segment, notable for its significant number of operators and volume of aircraft, plays a pivotal role in influencing low-altitude airspace and operations at

various airports. The inclusion of this group is essential given its substantial presence and potential impact on aviation dynamics.

In addition to our commitment to information collection activities, PACI proposes the following recommendations to the FAA for consideration:

1. **Low-Altitude Air Operations:** The prevalent narrative within the industry that routine aviation operations below 500 feet Above Ground Level (AGL) are exclusive to incoming or outgoing airport traffic is not accurate. This perception overlooks key operations like those of Part 135 Helicopter operators, who are authorized to fly at 300 feet AGL under 14 CFR Part 135.203, and can operate even lower over non-congested areas. Similarly, agricultural air operators conduct flights much closer to the ground under 14 CFR Part 137.49. This oversimplified narrative also ignores the existence of over 6,000 private-use heliports. The emergence and lack of regulation for droneports further complicates this scenario, potentially impacting these established operations and raising concerns about their coexistence in the same airspace.
2. **Part 157 Application:** The exclusion of droneports from the application of Part 157 has significant implications. According to Part 157, certain types of airports are not subject to its regulations. This includes airports under a Federal agreement requiring an approved airport layout plan, airports used for VFR operations for less than 30 consecutive days with minimal operations, and sites used intermittently for less than one year under VFR with limited usage. Droneports, by their nature, fit neatly into these categories. Their exclusion from Part 157 means that they are not bound by the same reporting and operational requirements that apply to traditional airports. As a result, droneports could be developed and operated without adhering to the processes outlined in Part 157, such as filing notices for airport construction, alterations, or deactivations. This regulatory gap could allow for the construction and operation of droneport facilities without the same level of FAA oversight and without needing to meet the criteria set for traditional airports. Consequently, as of now, there could be numerous droneport facilities operating across the country that, while serving a similar function to airports, do not fall under the same regulatory framework. This situation could lead to a lack of standardization and oversight in terms of safety, operational procedures, and airspace integration, potentially impacting the overall integration of UAS into the national airspace system. The absence of droneports from the scope of Part 157 could raise questions about consistency in regulatory approaches, particularly as the use of drones and the importance of droneports continue to grow..
3. **Adherence to Existing Rules:** The definition of an airport as outlined in 14 CFR Part 157 is comprehensive, encompassing a variety of air transport facilities. It defines an airport as any area used for the landing or takeoff of aircraft, including airports, heliports, helistops, vertiports, gliderports, seaplane bases, ultralight flightparks, manned balloon launching facilities, and any other aircraft landing or takeoff areas. This extensive definition supports the classification of droneports as airports. By nature, droneports serve as takeoff and landing areas for Unmanned Aircraft Systems (UAS), aligning them with the broad spectrum of facilities encompassed in this definition. The FAA's inclusion of diverse aeronautical facilities under the term "airport" in 14 CFR Part 157 opens the door for droneports to be officially recognized as airports in the same manner as the

2012 statutory definition of “unmanned aircraft” as “aircraft”. Such recognition is essential for establishing standardized regulations and operational protocols, ensuring safety and efficiency in our rapidly evolving airspace. Acknowledging droneports as airports under this regulatory framework paves the way for the integration of UAS operations into the national airspace system and fosters the growth of emerging aviation technologies.

4. **Charting Needs:** The necessity of charting for droneports is evident, particularly in terms of airspace management, drone routes, and safety protocols. This would enhance situational awareness for all airspace users.
5. **Radio Frequency Allocation:** Establishing dedicated radio frequencies for droneports is crucial for effective communication, coordination, and navigation, ensuring they operate safely within the national airspace. This will aid in both the conspicuity of drone operations, as well as providing necessary coordination in the absence of air traffic services.
6. **Database Tracking (ASIAS):** The Aviation Safety Information Analysis and Sharing (ASIAS) program, led by the Federal Aviation Administration (FAA) and the aviation community, is a collaborative initiative focusing on proactive safety analysis and data sharing. ASIAS fuses a variety of aviation data sources, including internal FAA datasets, airline proprietary safety data, publicly available data, and manufacturers' data, to proactively identify safety trends and assess the impact of changes in the aviation operating environment. Considering the extensive capabilities of ASIAS in handling and analyzing diverse data sets, integrating droneport activities into ASIAS could significantly enhance the safety and operational efficiency of these facilities. By providing ASIAS access to data related to droneport operations, it would be possible to monitor safety trends, assess the effectiveness of safety measures, and identify potential risks specific to droneport environments. This integration can be a substantial step towards ensuring a comprehensive and proactive approach to safety management in the evolving domain of unmanned aircraft systems.
7. **Emergency Landing Reserves:** Droneports should accommodate emergency landing and go-around scenarios. This requires careful planning of spatial reserves and safety protocols.
8. **Form 7480-1 Notification:** The importance of submitting Form 7480-1 cannot be understated. Without it, droneport activities remain unknown to the FAA, potentially leading to operational and safety challenges.
9. **Performance-Based Definitions for VTOL and STOL:** Establishing clear, performance-based definitions for Vertical Takeoff and Landing (VTOL) and Short Takeoff and Landing (STOL) aircraft, such as the ability to clear a 50-foot obstacle in a specified distance from takeoff, is critical for standardizing and regulating these operations.
10. **ADIP Access by OEMs:** Granting Aircraft Data Processing (ADIP) access to Original Equipment Manufacturers (OEMs) would enable them to program and train electronic pilots and autonomous systems. This is a key enabler for integrating advanced operational capabilities into the national airspace.

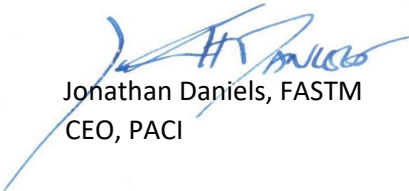
In closing, I wish to reiterate PACI's strong commitment to advancing the integration and regulation of Unmanned Aircraft Systems (UAS) in the national airspace. We believe our recommendations, rooted in extensive experience and technical knowledge, will significantly contribute to shaping an efficient, safe, and sustainable future for UAS operations, particularly in relation to droneports.

Our focus on charting needs, radio frequency allocation, and the inclusion of droneport data in the ASIAS database reflects our dedication to operational safety and efficiency. By emphasizing the need for performance-based definitions for VTOL and STOL, and advocating for ADIP access for OEMs, we aim to foster innovation and progress in UAS technology.

The constructive dialogue and insights shared in this letter stem from PACI's deep understanding of the complexities surrounding UAS integration. We look forward to participating in the FAA's stakeholder meetings, whether in person or virtually, to further discuss these critical topics.

Thank you for considering our perspective. We are confident that our collaborative efforts will lead to meaningful advancements in the UAS sector and contribute to the broader goals of the FAA and the aviation community.

Sincerely,



Jonathan Daniels, FASTM
CEO, PACI