February 12, 2020

Secretary Elaine L. Chao
U.S. Department of Transportation
1200 New Jersey Ave. SE
Washington, DC 20590

Dear Secretary Chao:

We write to you on behalf of the Academy of Model Aeronautics (AMA), the largest and oldest association of model aircraft enthusiasts in the U.S., to express our strong disagreement with your recent comment that the proposed rule for remote identification of unmanned aircraft systems (UAS) will be "tech neutral." [1] In our opinion, this could not be farther from the truth. If the proposed remote ID rule is implemented as is, it will be devastating to the model aviation hobbyist community – far more so than any other group.

We understand that remote ID may be helpful to keep the skies safe and secure with commercial or autonomous UAS. For years, we have advocated for an approach to remote ID regulation that is simple, cost-effective and easy to comply with. This is especially important for the model aviation community, which has been operating safely in the airspace for more than eight decades and which supports thousands of jobs, businesses and STEM learning opportunities.

Unfortunately, the FAA's proposed remote ID rule is overly complicated, potentially expensive, difficult and in many cases impossible for modelers to comply with. If implemented as is, the rule will be extraordinarily burdensome for the model aviation community and will disincentivize participation in the hobby. We have already seen a demonstrative drop in membership and participation in the hobby with the mere proposal of the Remote ID rule.

While the proposal includes an option to comply with remote ID by flying at FAA-recognized identification areas, the rule arbitrarily limits the number of identification areas and prohibits the establishment of new areas (after the initial 12-month period). In fact, the rule is expressly designed to phase out these identification areas over time, rather than treat them as a viable option for complying with remote ID. FAA-recognized identification areas must be part of the long-term solution to remote ID.

The proposal to change the current UAS registration rule and require model aircraft owners to register each of their model aircraft separately is unnecessary and constitutes an extreme overreach by the federal government. All model aircraft flown under AMA's community-based program remain within the visual line of sight of the operator making it simple and straightforward to identify the pilot. If the proposal to register model aircraft individually goes into effect as is, AMA's 180,000 members would be forced to

[1] Daniel Howley, "Elaine Chao describes people's biggest complaints about drones," *Yahoo Finance,* January 25, 2020, https://finance.yahoo.com/news/elaine-chao-drone-complaints-135036104.html.

register about 1.62 million aircraft at a cost of $8.1 million, assuming the $5 per aircraft registration fee does not increase over time. This is a sizable investment of time and resources for the individual hobbyist and a substantial economic impact to the model aviation community.

Again, we are deeply concerned the proposed rule on remote ID could impost significant costs and unnecessarily restrict our operations. We are asking your department and the FAA to review the guidance provided by the Remote ID Aviation Rulemaking Committee (ARC) to include emphasis that remote ID must have a low burden and cost of compliance. In addition, the proposed rule completely disregards the recommendations by Work Group Two led by security members of the ARC and tasked with the applicability of remote ID. The report clarifies that remote ID should apply to UAS that have the ability to navigate without direct control of the pilot or can operate beyond 400' with a real-time remotely viewable sensor. Please address the following concerns with the proposed rule:

- First, the rule should provide community-based organizations (CBOs), like AMA, more flexibility to establish and maintain fixed flying sites that satisfy remote ID compliance.
- Second, the rule should create a pathway for remote ID compliance at AMA events and competitions, which do not take place at fixed flying sites and are conducted at a myriad of venues within our communities.
- Third, the rule should account for situations where there is no internet connectivity, as many safe places to fly are in rural areas with little or no service.
- Fourth, the rule should revise the definition of amateur-built UAS to effectively delineate the categories of aircraft.
- Finally, the rule should not require modelers to register every aircraft individually.

We need your help to prevent the decline of model aviation industry, the many jobs that support it – and most importantly – the future pilots, engineers and aerospace experts. Model aviation is the natural precursor to careers in aviation, including commercial pilots, engineers and more – jobs which the U.S. desperately needs to fill. Furthermore, model aviation supports a $1 billion hobby industry responsible for supporting businesses big and small and thousands of U.S. jobs. We simply cannot afford to further harm the model aviation hobby with overly burdensome requirements.

We urge you to carefully consider the impact remote ID will have on the model aviation community. Modelers are passionate about our hobby, and equally concerned with keep our skies safe and secure. There must be a way to achieve the FAA's goal for remote ID and protect model aviation at the same time.

Sincerely,

Rich Hanson
President, Academy of Model Aeronautics (AMA)

Chad Budreau
Executive Director, Academy of Model Aeronautics (AMA)