

I am writing in response to the FAA's advanced notice of proposed rulemaking on the safe and secure operations of small unmanned aircraft systems (UAS), including model aircraft. My position is simple: model aviation has introduced no new risk into the airspace, and therefore should not be subject to new regulations.

[Insert personal introduction details such as: I am a member of the Academy of Model Aeronautics (AMA) and have been flying model aircraft safely and responsibly for XX years. I am also a model aircraft club officer/educator/designer, etc. I love to fly XX because...]

As the FAA considers new rules for UAS, I urge the agency to take into consideration the existing safety guidelines for modelers and account for the fact that model aircraft and commercial drones are not the same – the FAA cannot and should not take a one-size-fits-all approach to regulations. Not only would that approach run counter to the long-standing principles guiding both manned and unmanned aviation regulations, but it would also place an unnecessary burden on hobbyists like me who have been flying model aircraft for recreational and educational purposes safely for many years.

Hobbyists who fly model aircraft do not need to be included in new rules for drone operators because we already follow our own proven set of safety guidelines, often at remote fixed flying site locations. All AMA members fly according to the organization's safety code, which has been recognized by Congress as an effective means for managing the modeling community. Our existing safety guidelines work – and there's no reason to add new rules.

For example, AMA members always fly within visual line of sight of their aircraft, which allows model aircraft pilots to see and avoid anything that may be flying nearby. Also, AMA members must maintain a 25-foot distance between their aircraft and any individuals whenever they are flying. At competitions and events, spectators are required to stay behind a well-defined line, typically 50-100 feet away from the flight line where pilots are operating models, depending on the size of the event and aircraft.

Advanced drones, however, have created the possibility for new risk, and that's why AMA has supported giving the FAA the authority it needs over sophisticated drones with advanced capabilities, such as those designed for sustained and controlled navigation beyond visual line of sight. The FAA could use the presence of a navigational system that utilizes multiple waypoints as a means of differentiation between model aircraft and sophisticated drones.

New restrictions on model aviation could have a detrimental impact on long-standing model aviation events and competitions that support local charities and non-profits. Beyond curtailing events and harming charities, new rules would have a chilling effect on youth involvement in the hobby and stifle the benefits of utilizing model aviation in STEM education, ultimately hindering efforts to attract youth to the aviation industry.

Again, I urge you to consider model aviation hobbyists separately from operators flying sophisticated drones as you work on new rules for UAS. Not all model aircraft and drones are the same, so the FAA cannot simply take a one-size-fits-all approach.

Respectfully,