

United States Senate
WASHINGTON, DC 20510-1407

November 19, 2020

The Honorable Russell T. Vought
Director
U.S. Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

Dear Director Vought,

As the Administration seeks to finalize the Federal Aviation Administration's proposed rule on Remote Identification requirements for Unmanned Aircraft Systems (UAS), we urge you to ensure the final rule addresses the concerns of the recreational UAS community, many of which are model aircraft enthusiasts.

As you know, the recreational UAS community has supported the concept of remote identification as an essential tool for ensuring safe, open, and secure access to our nation's skies. This is especially needed to grow the many promising commercial applications of UAS. However, we are concerned that the proposed changes may effectively bar recreational UAS operators, including model aircraft enthusiasts, from the airspace. Recreational UAS operations, especially traditional model aircraft, are inherently different than commercial UAS operations. Model aircraft enthusiasts have safely operated for decades and have millions of hours of experience operating in the airspace.

We support remote ID requirements for UAS to safely integrate these aircraft into the airspace. At the same time, we hope you will consider the recreational UAS community's view that their operations within visual line of sight can best meet the safety and security objectives of remote identification requirements by (1) Operating at fixed flying sites or (2) Using an app-based software solution. We urge you to consider these options when finalizing the Remote Identification rule.

First, fixed flying sites are specifically designed to facilitate safe recreational operations. In fact, they have functioned without incident in communities across the U.S. for decades, including those in our State. This existing infrastructure makes it easy and safe for operations at fixed flying sites to satisfy the requirements of remote ID.

The NPRM's proposal to allow compliance with remote ID by flying at "FAA-recognized identification areas," which are essentially equivalent to fixed flying sites, is a good initial idea. However, we share the views of stakeholders who are deeply concerned that the proposed rule arbitrarily limits the number of identification areas and prohibits the establishment of new areas after the initial 12-month period. Limiting the number of dedicated flying sites will eliminate the ability of tens of thousands to continue flying without any safety or security justification. In addition, it would have an outsized impact on students and Junior ROTC cadets as their flying locations are more likely to change from year to year. Without modification, we are concerned that many flying sites in our State would ultimately be lost and those most affected would not be able to find alternative sites to fly safely.

Second, we are concerned about the potential for costly technological mandates on recreational UAS operators. Rather than impose technological mandates, we urge you to work with the private sector to develop an application-based software solution for remote ID that allows recreational operations outside of fixed flying sites, as long as they are still within visual line of sight. It is our understanding that several leading technology companies are already working on potential application-based solutions for your consideration.

We believe that these proposals would mitigate the impact of the proposed rule on the recreational UAS community while balancing the public safety and security needs that remote ID will help to meet. In addition, we believe these proposals will increase compliance and the overall effectiveness of the new system.

We urge the Office of Management and Budget to take these concerns into consideration when finalizing the proposed rule. The changes would achieve the FAA's goal of safely integrating UAS into the airspace without unnecessarily burdening recreational UAS operators. Thank you for the consideration of our views.

Sincerely,



Todd Young
United States Senator



Mike Braun
United States Senator