

UAS Integration Program - Up And Running

Amundsen Davis Aerospace Alert

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President Trump's administration has announced the creation of a new Integration Pilot Program. According to the president, "Our nation will move faster, fly higher, and soar proudly toward the next great chapter of American aviation."

That lofty rhetoric – worthy of Captain Kirk's Starfleet – may be a bit ambitious, but make no mistake, on November 8, 2017 the Department of Transportation took a big step forward in the commercialization of UAS (drone) technology when the FAA published the *Unmanned Aircraft Systems Integration Pilot Program*. *Federal Register*, Vol. 82, No. 215, November 8, 2017. To read *Unmanned Aircraft Systems Integration Pilot Program*, click [here](#).

A quick review of the history of this initiative is helpful to appreciate the significance of last week's announcement. The FAA has been methodically tackling this issue since the initial roadmap was published in 2013. Early commercialization efforts came through Section 333 Certificates of Waiver, which allowed for application-specific operations on a case-by-case basis. With the overwhelming flood of 333 waiver applications, last June, the FAA published the small UAS Rules, Part 107 (sUAS). These Rules contain significant limitations as to weight, altitude, speed, and areas of operation. The two most limiting requirements prevented operation beyond line of sight or over any individual not involved in the flight. These restrictions prevented commercialization in all but a very narrow set of circumstances. The Integration Program softens these restrictions to allow for more expansive use and development of UAS.

The Integration Program seeks to foster deep working relationships between "visionary stakeholders" and local governmental entities to test and develop broader uses for UAS technology. The program specifically calls for establishing dedicated drone-ports and developing delivery of goods via UAS to businesses and homes, as well as several agricultural and governmental applications. And, to facilitate these new opportunities, the program will consider waiver of the Part 107 restrictions for line of sight operation and operation over the public.

The first step is for the program to recruit what the FAA calls *Lead Applicants*. These are governmental entities interested in participating in the program and allowing testing to occur in their communities. The deadline for Lead Applicant applications is 2:00 p.m. on **November 28, 2017**. The initial notice process is not rigorous, but five additional segments of the application must be completed

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within the following six weeks.

Two weeks later, by 2:00 **December 13, 2017**, Lead Applicants must submit additional, more substantive information, including program participants and a detailed concept overview for UAS integration within their jurisdiction. This is also the private sector's first opportunity to join the program, by submitting a request to become an *Interested Party*. All Interested Parties must coordinate their application with a Lead Applicant to qualify for participation in the Integration Program. The final submission for both Lead Applicants and Interested Parties occurs on **January 4, 2018**.

Once accepted and approved, the program seeks to explore ways to safely expand cutting-edge drone operations within the National Airspace. While the Integration Program has a three year timetable, a successfully-proven applicant is not tied to the life cycle of this pilot program. The FAA is quick to point out that safety is not cast aside in this drive towards innovation. Rather, it is the expectation that the close collaboration between the private sector, local governmental entities, and the FAA will simultaneously implement new UAS applications while providing significant data from which the FAA may gauge safe operations.

The failure to meet any of these deadlines disqualifies participation.

Amundsen Davis is currently working with several clients seeking to become Lead Applicants and Interested Parties. Time is short, but it is not too late.