

AMA Activities Addressing FAA Rulemaking on small Unmanned Aircraft Systems (sUAS)

Former District X Vice President, Rich Hanson was designated by the AMA Executive Council to serve on a FAA sUAS Aviation Rulemaking Committee (ARC) formed in early 2008. The purpose of the ARC was to develop recommendations for the creation of a new Special Federal Aviation Regulation (SFAR) enabling the safe operation and integration of small Unmanned Aircraft Systems (sUAS) into the National Airspace System (NAS). The ARC was comprised primarily of members from the commercial UAS industry and other participants in the NAS such as the Aircraft Owners and Pilots Association (AOPA) and the Helicopter Association International (HAI); AMA was the sole member directly representing aeromodeling interests.

Over a period of approximately 10 months the ARC developed and submitted a set of recommendations dated April 1, 2009; and the document was released by the FAA in early May. The order creating the ARC as well as the committee's recommendations have been posted at www.faa.gov/uas under Regulations and Policies. The ARC recommendations will be used by the FAA as a resource in the rulemaking process.

AMA has posted the relevant sections of the recommendations, a set of FAQs and other relevant information on the AMA website at <http://www.modelaircraft.org/>. Section 2 of the recommendations deals with modeling activities conducted in accordance within an accepted and approved model aviation safety program developed by a "community-based" organization(s). Most of the requisite safety guidelines already exist in the AMA Safety Code and related documents, and it is AMA's intention to formulate an inclusive set of safety guidelines from these documents and submit a comprehensive Safety Program to the FAA for acceptance. In doing so, AMA's aim is to allow the aeromodeling enthusiasts to continue to enjoy and participant in the hobby in much the same way as they have in the past.

In late January, 2009, a committee of AMA members representing broad perspectives was created to develop the safety guidelines in response to the ARC recommendations.

AMA Work Group

Name	Member	Organization
Richard Hanson	Chairman	AMA - GRA
Michael Harrington	Member/Recorder	Safety Director - Team AMA Air Show Team Program, Love Air RC
Gary Fogel	Member	Torrey Pines Gulls/Torrey Pines Scale Soaring Society, San Diego, CA
Greg Hahn	Member	AMA - Technical Director
Andy Kane	Member	District of Columbia RC
Bryan Hudson	Member	Channel Islands Condors (Ventura, CA)
Jim Rice	Member	AMA EC, Safety Committee Chair
James Sizemore	Member	District of Columbia RC (FAA)
Dave Mathewson	<i>Ex Officio</i>	AMA President
Bruce Tarbert	Liaison	FAA, ARC Co-chair

The group has been meeting via a 60 to 90 minute weekly webinar/conference call and it's anticipated the work effort will take an additional 4-6 months to complete.

To offer suggestions or comments the Points of Contact for the committee are Rich Hanson at richh@modelaircraft.org, or Greg Hahn at greggh@modelaircraft.org

Activities and progress

- Reviewed documents from national modeling organizations in Canada, Australia and the UK
- Developed a clear definition of hobby/sport modeling activities
- Developed ConOps (Considered Operations) for all modeling activities based on contest regulations and other types of modeling activities
- Developing a risk analysis model
- Developing an outline for a comprehensive Model Aviation safety guidelines document which will include aspects of the AMA Safety Code, related documents and the specific items listed in Section 2 of the recommendations, most of which already exist in some form or another.
- Individual group member contributions to the document

Next Steps

- Completion of the draft Model Aviation Guidelines by October 2009
- Review/comment by the AMA Safety Committee and groups representing various modeling disciplines
- Review comments and revise as necessary
- Approval by AMA Executive Council
- Submission to FAA for review and approval and incorporation in the proposed rules

FAA Rulemaking Process

With the release of the ARC's final recommendations, the FAA began the next step in the rulemaking process. In reviewing and applying the committee's report the FAA has the latitude to accept the ARC's recommendations in total, accept a portion of the recommendations, or put aside the recommendations altogether and start over. The latter is fairly unlikely.

During this period the AMA will work directly with the FAA in formulating its set of safety guidelines and will continue striving to find reasonable solutions to our remaining concerns. When the FAA completes its work, which includes drafting regulatory language, conducting a safety assessment, and performing an extensive intra-agency and interagency review, it will create a final set of proposed regulations.

It's anticipated the proposed regulations will be published in the Federal Register as a Notice of Proposed Rulemaking (NPRM) sometime during the 2nd quarter of 2010. The NPRM provides for a period of public comment during which AMA and its members *must* stand up and be counted as the federal rulemaking process responds to numbers. In all, it is unlikely there will be a sUAS Special Federal Aviation Regulation (SFAR) in place much before the first half of 2011. The AMA will keep its members informed during the rulemaking process and apprised of relevant information such as the snail mail and electronic addresses to be used for comments during the NPRM period.