



Special edition

The following link takes you to a sign up page for Hobby Hanger to be included in their comments to the FAA regarding the proposed rule changes. If you do nothing else please add your name to the list.
<https://qrco.de/bbRRtb>

Additionally, anyone with good to great writing skills willing to help Kwan draft some letters this week please reach out to him at Hobby Banger.

[Suggestions for comments:](#)

[Leave your comments here:](#)

<https://www.federalregister.gov/documents/2019/12/31/2019-28100/remote-identification-of-unmanned-aircraft-systems>

You could adapt your comments from this text:

I am writing to express my concern with the FAA's proposed regulations on remote identification of unmanned aircraft.

[PERSONAL INTRODUCTION AS NEEDED]

I appreciate the FAA's interest in allowing for safe operation of commercial drones and limiting the potential for harm caused by uninformed and malicious drone operators. These goals do not justify imposing remote ID requirements on hobbyists engaged in the safe recreational operation of model aircraft and multirotors. FAA's proposed regulation will harm thousands of individual hobbyists, the businesses that support them, and their employees. It will also limit the availability of valuable educational opportunities for young people interested in aviation, robotics, mechanical engineering, and related STEM fields.

I have the following specific concerns with FAA's proposal.

First, the FAA has not sufficiently justified its rejection of the consensus recommendation of the UAS-ID Aviation Rule-making Committee. The consensus of this group, which the FAA convened at the direction of Congress, is that limited recreational operation of UAS should be excluded from any requirement for remote ID. Recreational model aircraft, including traditional balsa and plywood fixed-wing aircraft, helicopters, and FPV quadcopters that fly in close proximity to the ground and to the pilot have been built and flown safely in the United States for many years without presenting risks that could be mitigated by remote ID. The fact that law enforcement officials or commercial drone operators would prefer remote ID for all unmanned aircraft does not justify a single rule that treats hobbyists the same as Amazon.com.

Second, FAA's proposal to require all UAS pilots to register each unique aircraft is not practical for hobbyists and would be of limited usefulness in enhancing safety. Hobbyists build and repair aircraft from kits and components. They move parts from one airframe to another and often buy and sell used parts, making it difficult to identify a particular aircraft with a single serial number. It is also not clear that registering each aircraft separately would enhance safety. Pilots can fly only one model airplane at a time. If they are flying no farther away than they can see, it does not occur to me why it matters which airplane it is.

Third, FAA's proposal to allow amateur-built aircraft that do not meet the remote ID requirement to be flown at FAA-recognized identification areas is not a reasonable solution for hobbyists. FAA's proposal would not permit individuals to fly non-remote ID aircraft on their own property or on property where the owners have given their permission, even if they fly at low altitudes and in accordance with established safety guidelines. It also does not allow for the recognition of new fields or for existing fields to relocate when they are closed due to development. Under FAA's proposal, there would eventually be no place to fly home-built model aircraft.

One alternative to the FAA's proposal is to allow hobbyists that adhere to established safety guidelines to be exempt from the remote identification requirements. Active recreational flying locations could be identified through a smartphone application, which I understand is already currently available. Thank you for considering my perspective.



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