

November 2, 2015

Dockets Management System
U.S. Department of Transportation
Dockets Operations, M-30, Ground Floor, Room W12-140
1200 New Jersey Avenue, SE
Washington, DC 20590-0001

Delivered electronically via www.regulations.gov

RE: Clarification of the Applicability of Aircraft Registration Requirements for Unmanned Aircraft Systems (UAS) and Request for Information Regarding Electronic Registration for UAS

The National Air Transportation Association (NATA) is the public policy group representing the interests of aviation businesses before Congress, federal agencies and state and local governments. NATA's nearly 2,300 member companies are a vital prerequisite for a vibrant general aviation sector providing fuel, aircraft maintenance, parts sales, storage, rental, airline servicing, flight training, Part 135 on-demand air charter, and fractional aircraft program management. As a result, our members are directly impacted by the ways in which the Department of Transportation and the Federal Aviation Administration propose and amend regulations that impact operations in the national airspace system (NAS); we therefore appreciate the opportunity to submit comments.

NATA applauds the DOT and FAA efforts to clarify the statutory and regulatory requirements applicable to Unmanned Aircraft Systems (UAS) and model aircraft; specifically the aircraft registration requirements of 49 U.S.C 44101-44103 and 14 CFR Part 47. NATA commends the Department of Transportation's efforts to impose personal accountability for UAS operated in the NAS.

As the leading organization representing aviation service businesses, NATA's mission is to empower its members to be safe and successful aviation businesses. Therefore, we are concerned about the safety risks unauthorized and unsafe use of UAS pose to our

members operating general aviation aircraft. As the docket notes, "Pilot reports of UAS sightings in 2015 are double the rate of 2014" and this is a key indicator that mitigation strategies must be implemented to reduce the risks of accidents and fatalities occurring in manned aircraft. NATA supports the DOT and FAA requiring registration and marking to identify and track a UAS to its operator; however, the limits of these requirements must be acknowledged. The ability to track an unsafe or noncompliant UAS back to the operator will most often happen after an incident occurs rendering the UAS disabled, but still intact enough to determine registration information. Registration and marking are a good first step, but additional efforts are necessary to protect the safety of manned aircraft. Education of UAS owners and operators on the significant safety implications negligent operations can have for manned aircraft is essential.

The docket states, "Aircraft identification and marking will assist the Department in identifying owners of UAS that are operated in an unsafe manner, so we may continue to educate these users, and when appropriate, take enforcement action." NATA agrees, but further recommends that the UAS Registration Task Force Aviation Rulemaking Committee (ARC) develop educational resources (i.e. guidance material, handbooks, etc.) as one of their recommendations in order to enhance the situational skill and knowledge of the statutory and regulatory requirements and that this information is presented to UAS owner/operators **before** operating in the NAS.

As an advocate for aviation businesses and services, NATA appreciates the value and importance UAS operations provide to the U.S. economy and to the aviation industry. With proper safety regulations in place, both manned and unmanned aircraft will provide for a vibrant aviation industry.

NATA appreciates the opportunity to submit comments on this important issue and we applaud efforts by the DOT and FAA to uphold the highest standard of safety in the NAS.

Sincerely,

A handwritten signature in blue ink that reads "Megan Eisenstein". The signature is written in a cursive style with a large initial 'M'.

Megan Eisenstein

Senior Manager, Regulatory Affairs

National Air Transportation Association