



AIR LINE PILOTS ASSOCIATION INTERNATIONAL

THE WORLD'S LARGEST PILOTS UNION • WWW.ALPA.ORG

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May 7, 2018

Dear Senator:

The Air Line Pilots Association, International (ALPA) is the largest airline pilot union in the world representing over 60,000 pilots at 34 U.S. and Canadian airlines. ALPA is home to the world's largest non-government air safety organization. The expertise that our members have in all the disciplines necessary to address aviation safety has been made available to safety regulators for decades and our documented contributions to aviation safety are significant.

Unmanned Aircraft System (UAS) integration is a critical safety discussion that must continue to be closely monitored. In preparation for the May 8 hearing by the Committee, ALPA urges you to ensure that the integration of UAS is conducted with the safety of the passengers and crews who are currently utilizing the airspace as the highest priority.

Like many in the industry, ALPA will be watching when the Department of Transportation (DOT) and the Federal Aviation Administration (FAA) announce the names and locations of the Integration Pilot Program (IPP) activities on Wednesday. The IPP may advance the safe introduction of UAS into our nation's skies if the new risks to safety can be identified, adequate mitigations put in place, and if those mitigations are followed explicitly.

The lack of insight into the risk mitigations, their adequacy, and the necessary requirements for compliance with procedures are all areas of concern for ALPA. We have suggested to the FAA that the IPP operations should be reviewed by airspace users, including ALPA, so we may offer our expertise and understanding of how to minimize the risks inherent with these new airspace applications. In fact, we offered our air safety expertise to the FAA in November 2017 to assist in the review of the proposed risk mitigations by the IPP proponents.

Unfortunately, ALPA - nor any other industry stakeholder - has been asked to contribute to the development of the safety structure and plans needed for the UAS to operate in the IPP.

We urge the Committee to require the FAA to seek public input to the IPP operations so that a safety review by current airspace users can be conducted.

Another area of concern we respectfully ask the Committee to consider, is the level of authority the FAA currently has to regulate the safe operation of all UAS, including model or hobby UAS.

Two publicly reported collisions between aircraft and drones have been documented in the last year. Additionally, a widely disseminated video showing an airline aircraft flying underneath a

hovering UAS put the spotlight on the lack of authority the FAA currently has to fully regulate UAS operations.

In the video, the airline aircraft does not appear to take any evasive actions -- likely because the flight crew was not aware of the drone's proximate location. Small drones are very difficult to visually acquire by pilots in-flight, and small drones do not currently have electronic anti-collision technologies that are compatible with airline collision avoidance systems.

The FAA may never find the drone operator because drones are not required to be equipped with electronic identification and tracking technologies that would give the FAA or other law enforcement officials the information needed to identify the drone operator. Unfortunately, the FAA has not required aircraft identification and tracking technologies to be installed on unmanned aircraft.

Even if the FAA had established collision avoidance, or identification and tracking regulations, the FAA would not be able to promulgate rules for model or hobby drone operators due to limitations mandated in the 2012 FAA Modernization and Reform Act. Section 336 of P.L. 112-095 prohibits the FAA from "promulgate[ing] any rule or regulation regarding a model aircraft, or an aircraft being developed as a model aircraft." This restriction has limited the FAA's ability to fully regulate hobby UAS to the point that safety of the National Airspace is at risk.

As the Committee receives testimony at the May 8 hearing, we urge you to consider taking steps to provide the FAA with the full authority to regulate all UAS operations so that the safety of passenger and cargo flights will be protected. Only after Congress has given the FAA the authority that is required by modifying Section 336 can the agency begin to create the comprehensive safety framework for integration of all UAS into the National Airspace System.

Respectfully,

A handwritten signature in black ink, appearing to read 'Tim Canoll', written in a cursive style.

Tim Canoll
President