

March 14, 2016

Senator David G. Argall, Chairman  
Senate Majority Policy Committee  
Senate Box 203029  
State Capitol Building  
Harrisburg, PA 17120

Re: Public Hearing on Unmanned Aerial Vehicles

Dear Sen. Argall:

On behalf of our more than 7,500 members, the Association for Unmanned Vehicle Systems International (AUVSI) would like to highlight the positive societal and economic benefits of unmanned aircraft systems (UAS) technology. AUVSI is the world's largest non-profit organization devoted exclusively to advancing unmanned systems. It is clear that, once a federal regulatory framework is established, a burgeoning UAS market is waiting to be unleashed in Pennsylvania.

According to an AUVSI study, during the first 10 years after UAS are integrated into the national airspace, nearly 3,000 jobs are forecasted to be created in Pennsylvania along with over \$2.36 billion in economic impact. In fact, since the FAA announced it would grant exemptions for certain low-risk commercial UAS operations in May 2014, more than three dozen Pennsylvania businesses have already received permission to use unmanned aircraft for a variety of applications.

For example, Agscan, based in Broomall, received a commercial exemption to examine the condition of crops across the state. Joshua Brown, a Navy veteran and an expert in search and rescue, founded the company in 2014 and uses UAS to assess an acre of crops each minute, detecting abnormalities that are not always visible to the human eye. Using aerial data the UAS collects, AgScan can quickly identify crops that need attention for irrigation or insect problems.

Another example is Pittsburgh-based Identified Technologies, which has built its business around collecting visual, infrared and gas data with UAS. With help from the University of Pennsylvania's General Robotics, Automation, Sensing and Perception Lab, the UAS deliver insights for a myriad of purposes through land surveying and aerial mapping.

And one of Pennsylvania's largest insurers, Erie Indemnity Co., received an FAA exemption to use UAS in evaluating insurance claims. It plans to cut costs and keep employees out of dangerous situations by using its UAS to assess damage during a natural disaster or after a car accident, helping to expedite claims and settlements so that policyholders can rebuild more quickly.

It is critical that Pennsylvania continue to foster this emerging industry and allow even more widespread use of the technology rather than pass restrictive and duplicative legislation. In December 2015, the FAA asserted its regulatory authority over the U.S. airspace and cautioned states and municipalities against enacting conflicting UAS legislation.

“Congress has vested the FAA with authority to regulate the areas of airspace use, management and efficiency, air traffic control, safety, navigational facilities, and aircraft noise at its source,” the FAA wrote in a fact sheet. “A consistent regulatory system for aircraft and use of airspace has the broader effect of ensuring the highest level of safety for all aviation operations.”

The FAA’s message is clear. State proposals have the potential to create a complicated patchwork of laws that may erode, rather than enhance, safety. Meanwhile, it is worth noting that federal regulations governing the civil and commercial use of small UAS are expected to be finalized in the coming months, making any state legislation regarding UAS premature and unnecessary.

We urge you to leave the regulation of U.S. airspace to the FAA so Pennsylvania can continue to support UAS growth and reap the economic benefits rather than create inconsistencies with federal law and risk stunting a still-nascent industry. We greatly appreciate your time on this important issue and look forward to continue working with you.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian P. Wynne", with a long horizontal flourish extending to the right.

Brian P. Wynne  
President and CEO  
AUVSI

cc:

Sen. Guy Reschenthaler  
Sen. Joe Scarnati  
Sen. Richard Alloway  
Sen. Ryan Aument  
Sen. Camera Bartolotta  
Sen. Pat Browne  
Sen. Mike Folmer  
Sen. Scott Hutchinson  
Sen. Bob Mensch  
Sen. Mario Scavello  
Sen. Patricia Vance  
Sen. Elder Vogel  
Sen. Randy Vulakovich  
Sen. Scott Wagner  
Sen. Kim Ward  
Sen. Gene Yaw