



January 26, 2016

Docket Operations, M-30
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Room w12-140, West Building Ground Floor
Federal Aviation Administration
Washington, DC 20590-0001

RE: Docket Number FAA-2015-3273, Petition for Exemption, Daedalus Drone Services, LLC.

The Association of Air Medical Services (AAMS) and the National Association of State EMS Officials (NASEMSO) jointly write in opposition to the Petition for Exemption filed by Daedalus Drone Services. In its petition, Daedalus seeks exemption from certain FAA distance requirements relating to the operation of small unmanned aerial vehicles (UAVs).

The FAA promulgated the current regulation to provide a basic layer of safety to safely integrate UAVs into the National Air Space, while protecting the many manned aircraft operating in the low altitude environment. While UAV rules primarily revolve around airlines taking off and landing at airports, it must be recognized there is a large number of aviation segments that operate away from airports at low-altitude. Air Ambulance, Law Enforcement, Agricultural Aviation, Business Aviation, are just some of the aviation segments operating at low altitudes.

While we recognize the utility of the proposed uses of UAVs outlined in the petition, any exemption to the current FAA regulations introduced would diminish the basic safety measures the FAA implemented and would put at risk the numerous aviators who operate off-airport in low altitudes. In low-altitude aviation, a critical component of flight under visual conditions is "See and Avoid". In the case of UAVs, it can be adapted to "Sense, See, and Avoid". Either way, operators of unmanned aircraft must understand they have the same responsibilities as pilots of manned aircraft to operate within legal boundaries, do their part to "see and avoid", and safely share the airspace with all aviators. It should also be noted, in manned aircraft operations, specific responses and communication procedures exist between the conflicting aircraft. During an encounter with a UAV, spatial perspective and communication are lacking,

putting the manned aircraft operators at significantly greater and immeasurable risk. The ability of piloted aircraft to see small UAV/UAS in ample time to avoid them cannot be presumed. UAV/UAS are simply too small, are often travelling too fast, and are virtually invisible. Therefore, the responsibility to see and avoid must also rest with the UAV/UAS operators and reasonable separation requirements must be maintained.

Even with the current rules in place we are seeing an increasing number of near miss incidents between manned aircraft and UAVs. In addition, air medical providers have reported numerous incidents of drone activity near a hospital, helipad, or accident scene creating an unnecessary delay in providing emergency services. These incidents only increase the likelihood of a catastrophic event, imperiling not only the lives of those in the air, but also people and property on the ground.

The safety of our national air space, and the critical emergency services being provided by aviation assets, are too important to begin allowing exceptions to the basic safety criteria already established by the FAA. In fact, we would ask the FAA to strengthen their regulations on UAVs by including the following regulatory requirements which would allow for integration of UAV/UAS into low-level airspace while optimizing the safety and privacy of emergency personnel and patients in need of assistance:

- During the course of an emergency incident (i.e., law enforcement, fire prevention/suppression, HAZMAT management, EMS, etc.), no UAV/UAS may be operated above, below, or within 500 feet of the incident site. Exemptions to this are only allowed for UAV/UAS operations considered essential to incident management, and only when authorized by, and coordinated by, the specific incident command authority.
- At any time rotary-wing or fixed-wing aviation assets are part of emergency operations (e.g., air medical transport, search & rescue, law enforcement surveillance, fire operations, etc.), UAV/UAS separation is essential to optimize safety for emergency aviation operations. No UAV/UAS will be allowed to operate within 1000 feet of any emergency aircraft operations.
- UAV/UAS are prohibited from operating within 500 feet of any airport, heliport, helispot, or designated emergency landing zone (ELZ) that has emergency aircraft arriving, departing, or otherwise occupying these sites. In the event of an unforeseen

encounter with rotary wing or fixed-wing emergency aircraft, the UAV/UAS operator will immediately take action to both “see and avoid” and yield right of way to said aircraft, as a component of deliberate action to create maximum separation between UAV/UAS and traditional aircraft.

Once again, we appreciate the opportunity to comment on the petition for exemption. Please do not hesitate to contact us if we can be of further assistance.

Sincerely,



Rick Sherlock
President and CEO
Association of Air Medical Services



Paul Patrick
President
National Association of State EMS Officials