



Ms. Margaret Gilligan
Associate Administrator for Aviation Safety
Federal Aviation Administration
800 Independence Avenue, SW
Washington, DC 20591

RE: UASARC

December 29, 2011

Dear Ms. Gilligan

This correspondence is being submitted to highlight and attempt to correct the apparent oversight in not including UAS small business or end user stakeholders on the UASARC. The Remote Control Aerial Photography Association (RCAPA) was a primary force for the small business owner and UAS operator on the 2008 sUAS ARC (Order 1110.150). Our input was solicited then and a reasonable expectation existed that RCAPA would be a part of any future sUAS regulatory effort. However, RCAPA was completely unaware of the convening of this new ARC or its charter until it was made public in a FOIA request made by the sUAS News in November 2011. Upon even a cursory inspection, this ARC iteration lacks the semblance of a “fair balance” of participation, as there is absolutely no representation from the small business and services stakeholders; a disconcerting prospect when one considers that no less than **four** stakeholder groups represent the manned aviation community, and one large defense contractor (General Atomics) has **two** representatives on this same ARC. It is immediately obvious that the largest demographic of sUAS end users has gone totally unrepresented. This is in spite of section 8.b of the new charter that specifically states, “The membership will be balanced in points of view, interests, interests and knowledge and scope of the committee.”

All sections of the charter are relevant and are of concern to the small business and services stakeholder community. Furthermore, the work in this ARC dovetails with and is a continuance of the work and recommendations made in the 2008 sUAS ARC (Sec 5.b). It was the consensus of the participants of that ARC that many significant issues were not fully addressed or concluded in that effort. We assert that the items outlined and contained in the “Committee Procedures” (Jun 17, 2011), pertain to those issues, recommendations and the ensuing rulemaking as well as Global harmonization issues and a host of other objectives and goals relevant to the UAS business and end user stakeholders. We speak from experience as full members of the aforementioned sUAS ARC, and other Global efforts as the lone voice for the small business and end user stakeholder community. We are at the forefront and abreast of the issues and goals stated in the aforementioned charter.

We the RCAPA, therefore formally request inclusion as an amended chartered member on this UAS ARC citing the Federal Advisory Committee Act (5 U.S.C. Appendix 2), and on the grounds that the lack of small business empirical knowledge base and expertise will have a negative impact on the safety of the National Airspace System (NAS). The RCAPA also asserts that the lack of sector input will cause irremediable damage to manufacturers, suppliers and service providers and their ability to compete in both the domestic and foreign markets, constituting an undue and unfair economic disadvantage to this stakeholder demographic.

We eagerly await your reply.

Sincerely,

Rick Connolly, President
Patrick Egan, Director



CC:

The following Honorable members of the United States Congress

Rick Berg
Judy Biggert
Barbara Boxer
Henry Cuellar
Chip Cravaack
Donna Edwards
Dianne Feinstein
Chuck Fleischmann
Gabrielle Giffords
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SBA Ombudsman
White House Office of Science and Technology Policy

FAA
Acting Administrator
Leslie H. Smith
Richard Prosek

News outlets
Editors of the sUAS News
MSNBC
News Corp.
Science Editor, PBS News Hour
Drudge Report
Danger Room, Wired Magazine
UAS Vision

Other interested parties

We are a professional association of dedicated remote control aerial photographers. RCAPA™ provides operational safety guidelines, best business practices, networking information and new technology information