



December 1, 2022

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The Honorable Frank Lucas (R-OK-03)
Ranking Member
House Science, Space, and Technology Committee
2321 Rayburn House Office Building
Washington, DC 20515

Re: AUVSI Support for the National Drone and Advanced Air Mobility Initiative Act

Dear Ranking Member Lucas,

The Association for Uncrewed Vehicle Systems International (AUVSI) applauds you for spearheading the National Drone and Advanced Air Mobility Initiative Act (The Bill). We sincerely appreciated the opportunity to weigh in on the legislation while it was being drafted, and your staff was fantastic to work with. We value your leadership as Ranking Member of the House Science, Space, and Technology Committee (Committee) and we are excited to continue to work with you on this important initiative, and others, when you again take over as Chair of the Committee in the 118th Congress.

AUVSI has a history of endorsing and weighing in on legislation relating to Uncrewed Aircraft Systems (UAS) research and development (R&D) in both the civilian and defense spaces. We appreciate the Committee's sustained focus on R&D issues generally and the Committee's willingness to work with industry – including organizations of all sizes and levels of maturity – on this important initiative. We are proud to endorse and support The Bill.

AUVSI is the world's largest non-profit organization dedicated to the advancement of uncrewed systems, autonomy, and robotics. We represent corporations and professionals from more than 60 countries that are involved in industry, government, and academia. AUVSI's primary markets span the defense, civil, and commercial industries. Uncrewed systems represent an expansive market within the transportation system, and it is our mission to ensure all types of uncrewed systems and robotics companies that work with us have access to the resources they need to be successful in such a highly competitive industry. As players in the industry mature, the type of support needed also evolves. It is important that both innovation and proven technologies be supported through research and sustainable regulatory and operational integration.

AUVSI is constantly looking for ways to address some of the regulatory and legislative hurdles that can stagnate the deployment and integration of new and important technologies into our ever-changing national airspace system (NAS), on the ground, and at sea. More recently, our Air Advocacy Committee has increased its focus on issues related to counter-UAS (c-UAS) and Advanced Air Mobility (AAM). We are encouraged that The Bill would establish a c-UAS center of excellence to further expand c-UAS R&D. This is especially topical given the fact that

c-UAS authority soon expires for some federal agencies.

AUVSI sincerely appreciates the increased focus on AAM in The Bill, something we pushed for during the drafting process. We cannot overstate that meaningful integration of AAM aircraft requires adequate funding for the transformation of complex metropolitan airspace.

We believe that inter-agency coordination is highly important when it comes to UAS activities and the safe integration of these proven technologies into our transportation systems. We fully agree with you on the importance of R&D in achieving safe integration, while also maintaining and improving our national security. We have worked with the Office of Science and Technology Policy (OSTP) on many occasions and look forward to continuing to do so. As such, we are encouraged to see OSTP playing a key role in the R&D activities outlined in The Bill.

In The Bill, the National Drone and Advanced Air Mobility Initiative (Initiative) focuses heavily on R&D. We want to ensure the Committee is aware that much of the industry is no longer in an R&D phase. The commercial UAS and AAM industry, and the technology, is ready for operations at scale. Other countries are racing ahead, and we believe The Bill will help advance commercial operations, and increase and spur U.S. competitiveness. AUVSI believes that should The Bill be enacted, the Initiative and the National Drone and Advanced Air Mobility Research Institutes (Institutes) would be very successful, and we appreciate the changes you made to the initial National Drone Research Institutes, so their work is broader and inclusive of AAM. It is also encouraging to see that in Sec.102(d), The Bill ensures that the Initiative office coordinates with the AAM Working Group that was established in the AAM Coordination and Leadership Act (S. 516, which was recently enacted into law) to ensure activities are complementary to one another and not duplicative. Also, thank you for ensuring the participation of industry leaders, like AUVSI and our members, in the efforts of the Initiative and the Institutes.

Notably, involvement from the Federal Aviation Administration (FAA) was left out of previous iterations of The Bill. We applaud the FAA title that was included, per our feedback. While the National Aeronautics and Space Administration's (NASA) contribution to UAS, AAM, and other emerging technologies is valuable, we believe the FAA must play a key role in airspace integration of UAS and AAM, as they are the sole regulator of the NAS. The FAA should always work in conjunction with NASA on airspace integration and other initiatives like the ones outlined in The Bill.

AUVSI will continue to push that the FAA spend some of their R&D budget to mature concepts for Beyond Visual Line of Sight (BVLOS) operations. In that engagement, we will reference the BVLOS Aviation Rulemaking Committee (ARC) recommendations, a great place from which to draw potential efforts. Additionally, it would be valuable to have the FAA conduct R&D that matures approval of Associated Elements (given the new type certification boundaries), such as detect and avoid (DAA) technologies and their impact on electric battery propulsion and battery lifespan.

Thank you for hearing our concerns over the National Institute of Standards and Technologies pilot credentialing language and dropping it. We feared that the language could be in competition with the ARC recommendations. Unlike traditional aircraft that have a high degree of commonality, uncrewed aircraft can be vastly different in their design and operation. Training and qualification standards must be put in place taking into account the wide-ranging differences in platforms and capabilities of uncrewed aircraft and the ARC recommendations do that.

We appreciate the inclusion of the following limitation language at the end of the bill targeting:

“The purchase, acquisition, or operation of unmanned aircraft systems—

(1) produced or assembled in, or containing components produced or assembled in, a foreign country of concern; or

(2) produced or assembled by entities owned, controlled by, or subject to the jurisdiction or direction of the government of, a foreign country of concern.”

This signals a focus on ensuring domestic UAS competitiveness. What is very notable are the exceptions you all included for the acquisition of such UAS to be used for R&D purposes and to improve our nation’s c-UAS abilities. This is an important issue to AUVSI.

AUVSI is dedicated to serving as a resource for the Committee as it works to move The Bill and potentially incorporate it into the 2023 FAA Reauthorization. Our goal is to support the continued vitality of the uncrewed industry, across domains, and to equip this Administration and Congress with the knowledge and expertise necessary to help advance these technologies throughout the country. We, again, would like to sincerely thank you for asking us to weigh in on The Bill during drafting, and allowing us to submit this letter of support. We look forward to continuing to find ways to work together.

Sincerely,

Michael Robbins

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AUVSI