



**PRESIDENT'S DEPARTMENT
AIR LINE PILOTS ASSOCIATION, INTERNATIONAL**

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June 9, 2011

The Honorable Ray LaHood
Secretary
US Department of Transportation
1200 New Jersey Ave., SE
Washington, DC 20590

Dear Secretary LaHood:

As you know, the issue of integration of Unmanned Aircraft Systems (UAS) into our Nation's airspace has received much attention in recent months. Striking the right balance between the absolute necessity of maintaining existing safety levels in the National Airspace System (NAS), the potential value of UAS to the economy and the need for regulations that encompass the spectrum of UAS operations is a monumental challenge. The Federal Aviation Administration has begun making progress on meeting these challenges by directing the formation of two Aviation Rulemaking Committees, establishing a program office, and participating in ongoing discussions and working groups. We commend the FAA's efforts and offer the support of the Air Line Pilots Association, International (ALPA) in assisting in those activities.

ALPA's position remains firm that for UAS to operate safely in the same airspace as civil airliners, it is necessary that they meet the same standards as other occupants of the airspace. This means the aircraft must have the same capability as other aircraft to maneuver in response to ATC commands, avoid weather, and so forth. It means the redundant systems that provide the highest level of safety for the traveling and shipping public must be replicated for UAS designs. It means UAS pilots must meet the same high standards as those operating aircraft nearby, and it means the operating companies themselves must be held to the same high standards as airlines.

Having such standards in place before allowing UAS to have unrestricted access to the NAS is necessary to protect the safety record of airline travel we have all worked so hard to achieve. To date, the standards are still under development, and it may take several years to ensure the job is done right. We are concerned about the increasing emphasis, including proposals for Congressional intervention, on integrating UAS quickly rather than safely. ALPA does not believe it is possible to require that a system as complex as UAS in the airspace system can be "directed" to be safe by a specific date. The research must be done, the issues must be identified and explored, the technology must be matured, and procedures and standards must be developed. I believe you would agree that completing these essential actions should dictate the timing for declaring UAS to be safe for conducting unrestricted operations in the NAS.

ALPA has been an active participant in this complex undertaking for many years, and I offer my personal assurance that this Association will continue to be available to you and your Department as a resource. Please do not hesitate to call on us to help you ensure that the Nation's air transportation system remains safe.

Sincerely,

A handwritten signature in black ink, reading "Donald J. Moak". The signature is written in a cursive style with a large, stylized initial "D".

Lee Moak, President