



February 12, 2018

Dear Member of Congress:

The Air Line Pilots Association, International (ALPA) is the largest airline pilot union in the world and represents over 59,000 pilots at 33 U.S. and Canadian airlines. The National Air Traffic Controllers Association (NATCA) represents nearly 20,000 aviation safety professionals, including nearly 14,000 air traffic controllers. Additionally, NATCA represents engineers, architects, traffic management coordinators, and other aviation safety-related professionals. Airlines for America (A4A) advocates for passenger and cargo carriers to shape crucial policies and measures that promote safety, security and a healthy U.S. airline industry.

For the second time in just a few months, a recently reported incident between an Unmanned Aircraft System (UAS) or drone, and an aircraft has put the spotlight on the need for the Federal Aviation Administration (FAA) to fully regulate UAS operations to ensure the safety of the National Airspace System (NAS).

The most recent concerning event has been widely shared as a video on the internet, where the drone captures video of an airline aircraft (flown by ALPA members and controlled by NATCA air traffic controllers) flying just a few feet under the hovering drone as the airliner approaches an airport for landing. The airline aircraft does not appear to take any evasive actions, likely because the flight crew was not aware of the drone's proximate location. Small drones are very difficult to visually acquire by pilots in-flight or by air traffic controllers in the tower, and small drones do not currently have electronic anti-collision technologies that are compatible with airline collision avoidance systems.

Had the small drone been equipped with anti-collision technology the flight crews would likely have been made aware of the drone's proximate location soon enough to take evasive action that would ensure that there was no threat of collision with the drone.

The FAA may never find the drone operator because drones are not required to be equipped with electronic identification and tracking technologies that would give the FAA or other law enforcement officials the information needed to contact the drone operator. Unfortunately, the FAA has not required aircraft identification and tracking technologies to be installed on unmanned aircraft.

Even if the FAA had established collision avoidance, or identification and tracking regulations, the FAA would not be able to promulgate rules for model or hobby drone operators due to limitations that have been put in place by congress through legislation. Section 336 of the 2012 FAA Modernization and Reform Act prohibits the FAA from “promulgate[ing] any rule or regulation regarding a model aircraft, or an aircraft being developed as a model aircraft.” The restriction by Congress has limited the FAA’s ability to fully regulate model and hobby UAS to the point that safety of the National Airspace is at risk.

We strongly urge you to remove legislative restrictions that have been placed on the FAA that limit its safety oversight of UAS. The likelihood that a drone will collide with an airline aircraft is increasing. By providing the FAA with the full authority to regulate all UAS operations, the safety of passenger and cargo flights will be protected. Only after Congress has given the FAA the authority that is required by modifying Section 336 can the agency begin to create the comprehensive safety framework for integration of all UAS into the National Airspace System. We would also ask that Congress work to ensure that FAA pursues technology that can counter UAS that pose a safety risk.

Respectfully,



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