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March 10, 2016

Congressman Duncan Hunter
Office of Congressman Duncan Hunter (CA-50)
1611 N. Magnolia Ave, Suite 310
El Cajon, CA 92020

**Re: Petition to FAA for Exemption under Section 333 of the FAA Modernization
and Reform Act
FAA Docket FAA-2016-3232**

Dear Congressman Hunter:

I am writing to you for your help and to apprise you of the opportunity to achieve something for America that would instantly create jobs here in California, help the San Diego economy, lower the cost of operation for the FAA, should have bi-partisan support, and NOT COST ANYTHING TO IMPLEMENT. In short, this is one of those rare **really good ideas**.

The facts behind this are in the accompanying petition and emails with the FAA, but here is a short Executive Summary:

Drones are everywhere. In the news, in the air, and certainly controversial. BUT, the opportunity for use of small drones (or small unmanned aerial vehicles, sUAV for short) for worthwhile commercial operations within controlled guidelines is boundless, and the number of businesses ready to jump into this market and boost the economy is huge.

The FAA Modernization and Reform Act of 2012 forbids the commercial use of an sUAV in the national airspace, and the only way to gain approval for commercial use of an sUAV is to petition the FAA for an exemption. Such a petition must be filed with regulations.gov, and then it takes 30 days for regulations.gov to post the petition online and transmit it to the FAA. The FAA currently has over **6,000** pending petitions for exemptions under Section 333, and their resources are focused on processing those petitions on a timely basis of 120 days or less. So, while everyone at the FAA is working hard to be sure, potential commercial operators trying to follow the rules must abate their plans to start business for over 180 days. That six month delay is devastating in today's marketplace, giving scofflaws who are willing to operate outside of the law an unfair advantage.

The **solution** is to permit the FAA to issue **interim exemptions**. This would permit business owners to enter the marketplace under any restrictions the FAA thought to impose and the business owner was willing to accept, while the FAA considered the petition on the merits.

In my case I proposed such rules that I was willing to abide by, which are identical to rules the FAA imposed for identical petitions using identical equipment for identical purposes. If the FAA issued an interim exemption under these rules I could get my business started now, and probably so could most of the 6,000 other petitioners.

Conclusion

The staff of the FAA is not to be faulted; in fact as shown in the attached emails they are trying to help, but they must work within their own rules. All that is needed is a letter from you to the FAA urging them to institute interim exemptions as a way of getting people to work and helping clear the backlog of Section 333 exemption petitions.

Thank you for your consideration and time.

Sincerely yours,

A handwritten signature in cursive script that reads "Robert Rose". The signature is written in dark ink and is positioned below the "Sincerely yours," text.

Robert Rose