

AMA District I Reference Doc. 031551

**TYPE:** Create State Legislative

**Drone Study Commission** 

**AGENCY**: Representatives, R.I.

**ISSUES**: 11 member commission without representation from the

recreational community.

Bob Brown President

Gary Fitch
Executive Vice President

Keith Sessions Chief Financial Officer

Andrew Argenio District I V.P. CT, ME, MA, NH, RI, VT

Eric Williams District II V.P. NJ, NY, Europe

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Kris Dixon District V V.P. AL, FL, GA, MS, PR, SC, TN, VI

Randy Cameron District VI V.P. KY, IL, IN, MO

Tim Jesky District VII V.P. IA, MI, MN, WI

Mark Johnston District VIII V.P. AR, LA, NM, OK, TX

Jim Tiller District IX V.P. CO, KS, NE, ND, SD, WY

Lawrence Tougas District X V.P. AZ, CA, GU, HI, NV, UT

Chuck Bower District XI V.P. AK, ID, MT, OR, WA Honorable Representative Stephen Ucci

Re: Amendment for H 5293

March 15, 2015

Dear Representative Ucci,

The Academy of Model Aeronautics (AMA) is the official national association for model aviation in the United States with more than 175,000 members and 2,450 AMA flying clubs. My name is Andrew Argenio and I am a lifelong resident of Rhode Island. I have had the honor of serving as an AMA national executive board member and district vice president for the New England aeromodeling community for more than a decade.

I write today with respect to the H-5293 resolution creating an eleven member legislative commission to perform a comprehensive analysis of UAS/drones and recommend regulations for UAS use in Rhode Island. Although the AMA supports the creation of the commission and its purpose, we are concerned that commission membership includes all the right stakeholders to represent Public Operations (Governmental), Civil Operations (Non-Governmental) but omits commission membership for Recreational Operations (Aeromodeling) of sUAS/drones.

Undoubtedly, sUAS/drones operated by the aeromodeling community for recreational, educational, demonstration, and competition events in the national airspace (NAS), will continue to exceed all other UAS operations combined. AMA licensed/member pilots all together fly over 30 million flights per year or 7,500,000 hours of flight time yearly.

The AMA has been involved with the safe integration of UAS/model-aircraft into the NAS since 1936, before the FAA existed. The AMA, working in a collaborative effort with the FAA since 2008, continues to evolve its safety standards of operational requirements and limitations to mitigate risks for accommodating new technologies that meet or exceed FAA requirements for safe integration of sUAS into the NAS.

Because AMA club's and members maintain an impeccable safety record, model aviation regulations for AMA's recognized community-based organization were exempted from FAA regulation and signed into law by President Barack Obama on February 14, 2012, as Public Law 112-95 section 336 (c) and reaffirmed by the FAA Notice of Proposed Rule Making released on February 15, 2015.

In 2015 the FAA announced that it had partnered with the three leading organizations with a stake in UAS safety – the Association for Unmanned Vehicle Systems International (AUVSI), the **Academy of Model Aeronautics (AMA)** and the Small UAV Coalition in a "Know Before You Fly" campaign to spread the word about safe and responsible flying <a href="https://www.knowbeforeyoufly.org">www.knowbeforeyoufly.org</a>.

The state of Alaska established a Task Force on UAS in 2014 that included Legislators, University of Alaska, AUVSI and the Academy of Model Aeronautics. One of the outcomes of the Task Force is bill HJR5 expected to be passed this month which recognizes the AMA as a community-based organization with a long history of overseeing the nation's expansive aeromodeling community, promoting industry and community safety guidelines and best practices for recreational, hobby/sport related uses of UAS/model-aircraft.

We ask that you, as legislators, amend H-5253 so as to include within the legislative commission the "Academy of Model Aeronautics" (AMA) as you have done with AUVSI. The AMA's years of experience in creating operational standards for sUAS/model-aircraft/drones within its National Safety Code and in compliance with FAA regulations for safe and responsible flying, will add a knowledgeable sUAS member resource to the Rhode Island commission membership.

Unfortunately, I will be unable to attend the March 17<sup>th</sup> hearing on H-5293 because I am one of three Judges for the Annual Skills USA State Robotics Competition at the Cranston Area & Technical Center on Tuesday.

Thank you for considering amending H-5253. I would be pleased to meet with you to further explain our organization and its community-based safety programming or answer any further questions you may have.

Sincerely,

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The following are links to Alaska's HJR5, AMA and FAA UAS operational documents and Public Law -112-95 Sec 336 (c):

- 1) **ALASKA legislation** bill HJR5 recognizing AMA safety guidelines and best practices <a href="http://www.legis.state.ak.us/basis/get">http://www.legis.state.ak.us/basis/get</a> bill.asp?session=29&bill=HJR005
- 2) AMA sUAS Flight Safety Guide http://suas.modelaircraft.org/ama/images/sUAS Safety Program web.pdf
- 3) FAA Model Aircraft Hobby/Recreational Flying http://www.faa.gov/uas/publications/model\_aircraft\_operators/
- 4) FAA Overview of Small UAS Notice of Proposed Rulemaking <a href="http://www.modelaircraft.org/Gov/nprm/sUAS-Summary-chart-FINAL2.15.15.pdf">http://www.modelaircraft.org/Gov/nprm/sUAS-Summary-chart-FINAL2.15.15.pdf</a>
- 5) Public-Law 112 Sec 336 (c) Special Rule for Model Aircraft http://www.modelaircraft.org/files/HR658 020112.pdf