



June 13, 2023

U.S. Department of Transportation  
Docket Management System, Docket Operations  
West Building Ground Floor, Room W12-140,  
1200 New Jersey Ave., SE  
Washington, DC 20590

**Re: Request for Comment, Federal Aviation Administration, Department of Transportation; UAS Beyond Visual Line-of-Sight Operations (88 Fed. Reg. 33,855-33,857, May 25, 2023)**

To Whom It May Concern:

The U.S. Chamber of Commerce (“Chamber”) appreciates the opportunity to submit comments to the Federal Aviation Administration (“FAA”) in response to the above-referenced proceeding. The Chamber commends the FAA for considering several exemption petitions to enable certain beyond visual line of sight (“BVLOS”) operations, which helps lay the foundation for a broader FAA rulemaking on BVLOS operations.

Unmanned aircraft systems (“UAS”) already provide substantial economic and societal benefits to the United States such as disaster and emergency response, real estate photography, communications tower inspections, and construction. Enabling BVLOS operations will spur the introduction of further beneficial use cases, particularly delivery of retail goods and medicines, advanced infrastructure inspection, and long-range surveying. Given the wide range of use cases, the broader business community, workers, and consumers will benefit from accelerated FAA action to integrate UAS safely and efficiently as a user of the national airspace system (“NAS”).

The Chamber strongly supports the FAA’s efforts to address regulatory barriers to UAS integration, particularly to enable BVLOS operations. Exemption petitions are an important tool for the FAA to examine how the private sector intends to safely conduct BVLOS operations. However, we encourage the FAA to expeditiously consider the four underlying exemption petitions to provide regulatory clarity to petitioners and demonstrate to the industry the FAA’s preliminary approach to BVLOS operations. In considering these petitions, the Chamber urges the FAA to maintain a high level of

aviation safety, utilize consensus-based industry standards when appropriate, and pursue a performance-based regulatory approach.

Finally, we underscore that the United States must lead globally in cutting-edge technologies, like UAS, which requires a sound regulatory framework. While the consideration of BVLOS operations exemptions is a critical step forward, the FAA must also prioritize the promulgation of a comprehensive rulemaking to allow for industry and nationwide BVLOS operations. A comprehensive rulemaking is crucial to provide certainty for the business community and fully unlock the numerous benefits and use cases presented by BVLOS operations. Insufficient action to advance such a rulemaking will open the door for other countries to lead in this important technology and put American global leadership at risk.

The United States can ensure aviation safety and unlock immense benefits for workers, businesses, and consumers alike. The Chamber strongly encourages your expeditious review of the underlying exemption petitions and urges the FAA to move forward with a comprehensive BVLOS rulemaking. Please do not hesitate to reach out to Matt Furlow at [mfurlow@uschamber.com](mailto:mfurlow@uschamber.com) with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'TK', with a long horizontal flourish extending to the right.

Tom Quaadman  
Executive Vice President  
Chamber Technology Engagement Center  
U.S. Chamber of Commerce