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Submitted on Behalf of the News Media Coalition Comprised Of:

Advance Publications, Inc.
A.H. Belo Corp.
American Broadcasting Companies, Inc.
The Associated Press
Capitol Broadcasting Co.
Cox Media Group, LLC
Fusion Media Network, LLC
Gannett Co., Inc.
Getty Images (US), Inc.
National Press Photographers Association
NBCUniversal Media, LLC
The New York Times Company
Reuters
The E.W. Scripps Company
Sinclair Broadcast Group, Inc.
TEGNA, Inc.
WP Company LLC

November 6, 2015

Via Electronic Filing and Courier

Docket Operations, M-30
U.S. Department of Transportation (DOT)
1200 New Jersey Avenue SE
Room W12-140, West Building Ground Floor
Washington, DC 20590-0001

**Re: Docket No. FAA-2015-4378
Clarification of the Applicability of Aircraft Registration Requirements for
Unmanned Aircraft Systems (UAS) and Request for Information Regarding
Electronic Registration for UAS**

For nearly two years, the News Media Coalition has worked cooperatively with the federal government to promote the safe gathering of news by UAS through development of statutes, regulations, educational materials, aeronautical knowledge testing, flight training, flight safety manuals, and professional best practices. Throughout this cooperative effort, the News Media Coalition has stressed, and the government has acknowledged, that the First Amendment rights of the public in receiving news and information in the public interest, and the media in gathering that news and information, must be preserved in the regulation of any new technology, including UAS.

With this compelling public interest in mind, the News Media Coalition respectfully offers this Comment to the Federal Aviation Administration's Clarification of the Applicability of Aircraft Registration Requirements for Unmanned Aircraft Systems (UAS) and Request for Information Regarding Electronic Registration for UAS, published in the Federal Register on October 22, 2015 (the "Request for Information").

Any registration process established by the FAA must avoid placing an undue burden on the First Amendment right to gather and disseminate news. Specifically:

- **Registration Obligations Should Be Applied at the Point of Sale (Questions 2 and 3):** The News Media Coalition is concerned that registration obligations will be costly and burdensome if they are imposed directly on UAS users. Such obligations could pose an unnecessary barrier to the use of UAS for newsgathering purposes, particularly in small markets, if registration is not immediate at the point of sale and instead requires additional steps by the operator. Accordingly, we strongly urge the FAA to require registration at the point-of-sale with registration information submitted by the seller, rather than the end-users. Registration at the point of sale would ensure more consistent compliance with registration requirements amongst users, compared with leaving registration to the convenience of the purchaser. Re-registration or supplemental registration should be required only upon the subsequent sale of UAS.
- **Only Necessary Contact Information Should Be Collected (Question 7):** The FAA should only require the submission of the limited contact information from users necessary to ensure accountability. The make, model and serial number of the UAS and the user's name; employment address, telephone number, email address; and company affiliation should be sufficient to positively identify the aircraft owner and aircraft. The serial number for each UAS should be transferable to an identical model of UAS. The information currently collected from certain UAS operators, such as Section 333 exemption holders, is based on data collected from owners of manned aircraft and is unnecessary and overly burdensome as applied to operation of small UAS.
- **Registration Should Be Web-Based (Questions 6 and 8):** To avoid unnecessary administrative burdens and bureaucratic delays, registration should be web-based. Information about the registration should be available in an easy-

to-use and searchable online database that provides access consistent with that provided by the FAA for other aircraft registration.

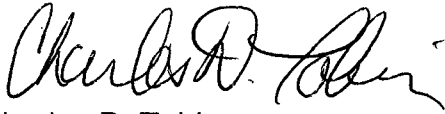
- **Registration Rules Should Allow for Immediate Use of UAS (Question 5):** Operation of UAS should be permitted upon submission of registration information, rather than awaiting affirmative approval or imposing a waiting period before a UAS may be legally operated. Any delay or additional affirmative steps could restrict an otherwise qualified UAS operator from exercising her First Amendment rights.
- **Registration Should Not Impose a Filing Fee (Question 5):** There should not be any fees—for users or sellers—to file UAS registrations with the FAA. The filing process should be simple enough that filers will not have to incur additional costs to file the registration. To the extent the FAA decides to impose a registration fee, it should be lower than the registration fee of \$5 currently applied to manned aircraft registration, given that registration of small UAS should be simplified and require far less data than currently required for manned aircraft.
- **Detailed Flight Plans Should Not Be Required (Question 5):** Registration should be limited to procedures in place at the point of sale. Additional registration submissions should not be required prior to operation of the UAS. In particular, the News Media Coalition is concerned about any registration requirements that would require that operators file detailed flight plans with the FAA. Such onerous filing requirements would not meaningfully contribute to safety and would constitute the close monitoring of newsgathering by the government. Further, such a requirement would make it virtually impossible to use UAS for breaking news stories without a direct safety benefit. As a practical matter, UAS must be flown within line of sight and therefore detailed flight plans for UAS in such a small airspace would be impractical and counterproductive.
- **Micro UAS Should Not Have Registration Requirements (Question 4):** To the extent the FAA adopts special rules for micro UAS, those vehicles should be exempt from registration requirements. Collection of such information would be overly burdensome to users and to the FAA and, given micro UAS operational limitations and safety benefits, is not necessary to ensure safety of the national airspace.
- **Final sUAS Rule and Education Will Improve UAS Safety and Accountability (Question 10):** To encourage accountability and responsible use of UAS, the FAA should expeditiously finalize the small UAS rule to provide clear commonsense rules of the road for commercial users. The FAA should also utilize stakeholders to help better educate UAS operators, including hobbyists, regarding current regulations and best practices for safe UAS operation.

* * * *

So long as UAS registration requirements impose these minimal requirements on UAS use by the news media, the News Media Coalition believes that UAS registration

can help facilitate the safe integration of UAS into the national airspace, while reasonably accommodating the First Amendment-protected use of UAS for newsgathering.

Very truly yours,



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