U.S. Chamber of Commerce



1615 H Street, NW Washington, DC 20062-2000 uschamber.com

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The Honorable Dr. Alondra Nelson Director Office of Science and Technology Policy Executive Office of the President Eisenhower Executive Office Building 1600 Pennsylvania Avenue Washington, DC 20500

Dear Director Nelson:

American leadership in advanced aviation platforms — unmanned aircraft systems (UAS or drones) and electric vertical takeoff and landing (eVTOL) aircraft — is essential for our economic and national security, and we appreciate the Summit on Advanced Air Mobility you recently convened and for inviting the U.S. Chamber of Commerce to participate. The Biden administration has a unique opportunity to assert American leadership for UAS and eVTOL in partnership with industry, Congress, and other relevant stakeholders. As the Administration contemplates building off the success of the Summit, the Chamber offers the following high-level recommendations as immediate next steps.

- Develop a National Strategy for Advanced Aviation Platforms: A comprehensive
 and government-wide strategy to ensure the safe and innovative integration of
 UAS and eVTOL into the national airspace is long overdue. The Administration
 should develop a comprehensive government-wide strategy to strengthen
 United States global competitiveness in UAS and eVTOL. The development and
 content of such a <u>strategy should</u> involve all relevant federal agencies, identify
 key milestones and objectives, and provide opportunity for robust nongovernmental stakeholder engagement.
- Expeditiously Implement the Counter-UAS National Action Plan: The Chamber believes that the Action Plan provides a cohesive and measured approach to protect against threats posed by UAS. The Administration should prioritize implementation of the Action Plan's executive branch components, and incorporate appropriate guardrails to ensure aviation safety, provide for continued federal regulation of the national airspace, and protect authorized commercial activity.

- Enable Routine Beyond Visual Line of Sight (BVLOS) Operations: Full integration of UAS into the national airspace requires FAA to enable BVLOS operations at scale, which would unlock innovative uses of drones such as delivery, long-distance surveying, and inspection. FAA should initiate rulemaking to allow for routine BVLOS operations as well as enable BVLOS operations shielded by structures and terrain. The Administration should also establish a clear timeline for BVLOS rulemaking activities to provide certainty for industry stakeholders using, developing, or otherwise being impacted by BLVOS operations.
- Initiate Rulemaking to Protect Sensitive Fixed Site Facilities: Comprehensive, nationwide protections for critical infrastructure and other sensitive fixed site facilities is a cornerstone of secure and safe UAS integration. The Chamber remains concerned that a rulemaking implementing Section 2209 of the FAA Extension, Safety, Security Act of 2016 remains significantly delayed. As a diverse range of industry stakeholders has emphasized, the Administration should prioritize this rulemaking. While this rulemaking touches on complex issues, the framework offered by industry would facilitate Section 2209's objectives in a manner consistent with the FAA's statutory responsibilities.

The Chamber appreciates the Administration's interest and focus on the future of aviation and integrating innovative technologies into the national airspace. We look forward to working with you on these issues moving forward. If you have any questions, please reach out to Matt Furlow at mft.richamber.com.

Sincerely,

Tom Quaadman

Executive Vice President

Chamber Technology Engagement Center

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