



**SMALL UAV  
COALITION**  
*A Partnership for  
Safety & Innovation*

October 7, 2016

The Honorable Edith Ramirez  
Chairwoman

The Honorable Maureen K. Ohlhausen  
Commissioner

The Honorable Terrell McSweeney  
Commissioner

Federal Trade Commission  
600 Pennsylvania Avenue NW  
Washington, DC 20580

Re: [FTC Fall Technology Series: Drones](#)

Dear Chairwoman Ramirez and Commissioners Ohlhausen and McSweeney:

On October 13, 2016, the Federal Trade Commission will host a workshop on unmanned aerial systems (UAS), or drones, as part of the Fall Technology Series. The Small UAV Coalition, the first group of its kind focused solely on commercial drone operations, appreciates the invitation to participate in the workshop and looks forward to Commissioner Ohlhausen's opening remarks.

The Coalition supports efforts to preserve privacy while increasing safety and accountability as a means of boosting the development of this industry and its massive economic potential. Along with many of its members, the Coalition was pleased to participate in the National Telecommunications & Information Administration (NTIA)-convened multistakeholder process through which industry reached consensus on best practices that set the appropriate guidelines on self-regulation with respect to privacy and UAS operations. On May 18, 2016, the Coalition was among the wide range of stakeholders representing industry, consumer groups, privacy advocates, and the news media that endorsed the framework.

Like many in the industry, the Coalition has also worked with federal, state, and local officials to develop laws and regulations that recognize the Federal Aviation Administration's exclusive jurisdiction over the national airspace while preserving authorities traditionally left to states and localities, including privacy. The Coalition also advocates for technical initiatives, such as an unmanned traffic management (UTM) system, which will ensure both safety and accountability.

It is the Coalition's understanding that as part of the upcoming drone workshop, the FTC Office of Technology Research and Innovation (OTech) will present the results of research it conducted with three drones purchased off the shelf, all of which sell for approximately \$200 and only accommodate WiFi connections. Panelists were told that the results of this research would be

October 7, 2016

Page 2 of 2

made available before the workshop, but have since said that will not be the case, which runs counter to the FTC's mission of transparency.

The future of the UAS industry lies in commercial operations. One recent report found the value of drone powered solutions across a wide range of industries – from infrastructure to insurance, telecommunications, and agriculture – to be \$127 billion. The safety and security of these operations will rely on a wide range of technical solutions, including a diverse array of licensed and unlicensed spectrum, encrypted data over secure connections, authenticated users and devices, and advanced positioning/navigation and autopilot features. The entry-level drones tested likely do not possess any of these features that are currently available or in development. However, the vast majority of devices yet to be sold will and these advances will filter down to the \$200 drone of tomorrow. Commercial operators will demand robust systems and the advancement of these technologies will benefit consumer products.

The decision to focus OTech's research on these unsophisticated vehicles represents a marginalization of the industry and the lack of context will distort its true nature, resulting in a missed opportunity for a constructive discussion on the unique privacy issues that the industry faces.

As the successful NTIA process demonstrated, a multistakeholder perspective is critical to this type of dialogue. The Coalition is also disappointed that the FTC chose not to include key voices – including New America, the Center for Democracy and Technology, and the Future of Privacy Forum – in the workshop, despite other panelists offering to make room for their participation. These groups were invaluable to building consensus through the NTIA multistakeholder process and should be included in any discussion of UAS privacy issues.

Thank you for your interest in these important issues.

Sincerely,



[www.smalluavcoalition.org](http://www.smalluavcoalition.org)

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