



**National Society of Professional Surveyors**  
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## **NSPS Comments to the Federal Trade Commission (FTC)**

### *"Seminar Addressing Drones "*

Having incorporated the American Congress on Surveying and Mapping (ACSM) within the National Society of Professional Surveyors ((NSPS) [www.nsps.us.com](http://www.nsps.us.com)) in 2012, NSPS is the preeminent national professional society working in affiliation with the respective state societies of professional surveyors and along with persons trained, registered, or interested in the profession of surveying and mapping. NSPS advances the sciences and disciplines within the profession and strives to establish and further common interests, objectives, and political efforts to help bind the surveying profession into a unified body in the United States. NSPS is the interface for the surveying profession with a multitude of national organizations in related fields, and with federal government entities.

NSPS strongly supports the safe integration of commercial unmanned aircraft systems (UAS) into the National Air Space (NAS). UAS presents an extraordinary opportunity for utilization by surveyors to provide services to contribute to public health, safety, and welfare, and enhance the quality of life of all Americans, foster economic growth, increase the efficiency of surveying activities, and create business opportunities for the surveying profession.

Geospatial data is essential to commercial and governmental activities, the collection, storage and use of which can and should continue to be permitted and encouraged for the benefit of the citizens of the United States. Geospatial data is derived from images and data collected from a variety of manned and unmanned airborne platforms, satellites, as well as other mobile and terrestrial-based acquisition systems. Such imagery and data is regularly and has been historically collected, utilized and applied by companies and licensed professional surveyors engaged in the free market commerce of the United States and by government authorities operating within the safeguards, rights and framework established by the Fourth and Fourteenth amendments to the Constitution of the United States. Geospatial imagery and data collection, usage and application is a valued part of the modern American economy broadly applied to improve the analyses and decisions necessary to sustain and enhance the quality of life, and does not threaten the privacy of individual citizens. In many states, surveyors are provided "right of entry" onto private property by statute. UAS represent a new aerial platform on which to do this same type of remote sensing for mapping and surveying applications.

Therefore, the regulation of surveying, mapping and geospatial data, or its collection from a UAS, would have severe, negative and unintended consequences for the government, business and individual U.S. citizens. Geospatial imagery and data collection, usage and application is a valued part of the modern American economy broadly applied to improve the analyses and decisions necessary to sustain and enhance the quality of life, and is not synonymous with "precise geolocation data" as such term is used by the Federal Trade Commission (FTC) and in some regulatory and legislative proposals. The geospatial community functions in a manner that does not threaten the privacy of individual citizens, and in fact contributes to the quality of life of all Americans.

NSPS cautions the FTC that regulations limiting the "technology" of UAS should be discouraged. Instead, regulations, when needed to protect the privacy of citizens, should be designed to regulate the "application" of this technology. NSPS respectfully urges the FTC to support the general approach of little or very limited government regulation affecting commercial UAS operations.