

First Weedwacker Aero Squadron
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Docket Operations, M-30
US Department of Transportation
1200 New Jersey Avenue, SE.
West Building Ground Floor, Room W12-140
Washington, DC 20590-0001.

Subj: Docket Number FAA-2014-0396

Greetings,

On behalf of the membership of the First Weedwacker Aero Squadron radio control model airplane club, we the Board of Directors wish to present our views with respect to Docket No. FAA-2014-0396, Interpretation of the Special Rule for Model Aircraft. We represent 157 active recreational hobbyist in the Southern California region who will be affected by the regulations put in place by the Federal Aviation Administration (FAA). In our presentation, our views are based upon our charter within the Academy of Model Aeronautics (AMA) and the regulations and guidance dictated by that national community-based organization.

Issues

1. First Person View (FPV) definition of “line of sight”.
 - a. The intention of “first person view” is to provide the operator a direct sense of flight while at the controls of the air vehicle. This is one of the most exciting and educational aspects of the hobby in the last decade. We believe that the “plain language” of the statute cannot be directly interpreted to preclude people other than the operator from participating in the controlling function of the aircraft. In the case of recreational model aircraft flown under the oversight of a community based organization, the inherent danger is not to the national airspace, rather to people and property on the ground within the geographic boundaries of an organized club. As the aircraft must be flown within the boundaries of a permanent modeling facility, it would be also held to the requirements of operating model aircraft in airspace covered by 14 CFR Part 91¹.
 - i. The AMA has established clear guidelines for use by organized clubs that provide for a two-person team as the “operator”. Current AMA guidelines permit the operator to view the flight scene through an electronic viewing device² while in control of the model aircraft while a second person is standing by in the event that the video data link is lost. The spotter is responsible for maintaining visual line of sight of the aircraft such that, at a moment’s notice, the spotter can take control from the operator in the event of a video link failure (loss of scene).
 - ii. While the operator is in control of the flight, the spotter also exercises the same see-and-avoid methods used in full scale aircraft. The spotter can communicate required maneuvers to the operator just as a co-pilot of the full-scale aircraft would scan the sky and communicate hazards to the pilot that are out of the pilots direct line of sight.
 - b. In the case of hobbyists flying FPV outside of established AMA guidelines, we agree that the FAA should by all means take enforcement action.

¹ §§ 91.126 through 91.135 and part 73

² Including goggles, computer screen, etc.

2. Definitions of commercial use
 - a. We agree with all but one of the examples provided by the FAA in the attempt to distinguish between recreational and non-recreational activity. In the case of “Receiving money for demonstrating aerobatics with a model aircraft”:
 - i. Sponsored demonstration pilots flying at a sanctioned recreational event do so to promote the recreational aspect of the hobby.
 - ii. In addition, those demonstrations are generally conducted in observation of 14 CFR Part 91 and are sanctioned by the AMA.
 - iii. Demonstration flights of model aircraft operated in such a manner should be considered hobby or recreational activity with no further restrictions.
3. Other forms of recreational model aircraft
 - a. We believe that the “plain language” of the statute cannot be used without further application of careful definition. Neither the congressional statute nor the FAA’s interpretation make any reference to the control method or venue of the aircraft. From the language, it appears that both are referring only to radio controlled model aircraft. However, other aspects of the hobby include control line and free-flight operations as well as indoor flight venues.
 - b. Control line models are flown using a tether to a handle in the operator’s hand. The operator controls the flight via direct mechanical linkage through a set of tether lines³. These aircraft do not leave the immediate vicinity of the operator and are always within the length of the tether. They pose no threat to the national airspace and should be exempt⁴ from any regulations put in place to protect the national airspace.
 - c. Free flight models are flown without any method of control input. The models are built and trimmed with the goal of achieving a predicted flight pattern without external input. When flown outdoors, these models pose a much greater risk to the national airspace and most assuredly require attention with respect to proximity to controlled airspace.
 - d. For all three of these aircraft types (radio controlled, control line and free flight), some are very small and are flown indoors in gymnasiums and hangars. These models require specific consideration within the FAA’s regulatory language. These aircraft can be flown in a hangar on an airport without any requirements for communication with the tower or airport operator and without any threat to controlled airspace.
 - e. In each of these cases, the statute and the FAA’s interpretation require additional distillation to fully capture and mitigate the true hazards.

We thank you for taking our viewpoints into consideration.

Gary Rold, President

Ron Smith, Vice President

Scott Graupmann, Treasurer

Bruce Allen, Secretary

³ Tether lines are usually 30 to 70 feet in length and are of material such as braided steel cable or high-strength polyester to sustain flight loads.

⁴ Or clearly recognized