



NATIONAL CONFERENCE of STATE LEGISLATURES

The Forum for America's Ideas

Curtis Bramble
Senate President Pro Tempore
Utah
President, NCSL

Karl Aro
Director of Administration
Department of Legislative Services
Maryland
Staff Chair, NCSL

William T. Pound
Executive Director

Jan. 7, 2016

The Honorable Michael Huerta
Administrator
Federal Aviation Administration
800 Independence Ave., SW
Washington, DC 20591

Docket ID No. FAA-2015-7396

Dear Administrator Huerta,

The National Conference of State Legislatures (NCSL), the bi-partisan organization that represents the state legislatures of the nation's states, commonwealths, and territories would like to express appreciation to the Federal Aviation Administration (FAA) for providing clarity on Unmanned Aerial Systems (UAS) registration requirements. However, NCSL requests that within the final regulation, states be allowed, if they so choose, to conduct the registration and enforcement of the UAS rule. If a state does choose to oversee the registration and enforcement of the FAA's final rule, the federal government should ensure adequate resources are made available.

In 2015, hobbyists in the U.S. were estimated to have purchased nearly 700,000 UAS for use in airspace regulated by the FAA. Yet due to the lack of formal federal rules and regulations pertaining to the use of UAS, states acted on their own. In 2015 alone, 45 states introduced legislation addressing UAS and 24 states enacted new laws or resolutions. Now that the FAA released the interim final rule requiring registration of certain UAS, we urge the agency to utilize this knowledge and experience of state legislatures throughout the regulation and registration process.

NCSL created the UAS Foundation Partnership in 2014 to facilitate candid discussions between state policymakers, industry leaders and end users, in order to identify options for maximizing the benefits of UAS while also addressing privacy, safety and 4th amendment concerns. NCSL is pleased to offer its assistance to the FAA through its UAS Foundation Partnership to provide information, data, or simply a forum for constructive engagement between states and the federal government.

NCSL looks forward to working with the FAA as it continues to develop formal rules and regulations pertaining to UAS and again urges the agency to recognize the states as the leaders in

Denver
7700 East First Place
Denver, Colorado 80230-7143
Phone 303.364.7700 Fax 303.364.7800

Washington
444 North Capitol Street, N.W. Suite 515
Washington, D.C. 20001
Phone 202.624.5400 Fax 202.737.1069

Website www.ncsl.org
Email info@ncsl.org

UAS policy. Please contact NCSL staff, Ben Husch (ben.husch@ncsl.org) and Melanie Condon (Melanie.condon@ncsl.org) with any additional questions.

Sincerely,



Delegate Sally Jameson
Maryland House of Delegates
Co-Chair, NCSL Natural Resources and
Infrastructure Committee



Senator Cam Ward
Alabama Senate
Co-Chair, NCSL Natural Resources and
Infrastructure Committee

Supplemental Documents:

[NCSL's Organized Deployment of Unmanned Aerial Systems Policy Resolution](#)
[NCSL Web-brief on Current Unmanned Aircraft State Law Landscape](#)