

## **POSITION STATEMENT ON SMALL UNMANNED AERIAL SYSTEMS**

### **Version 2.1**

The Association of Critical Care Transport (ACCT) believes there should be oversight, regulation, and monitoring provided for all classifications and users of Unmanned Aerial Systems (UAS), including commercial (business), public (governmental agencies), and hobbyists (recreational). Helicopter Air Ambulances (HAA) are seeing UAS's in their flight areas with increasing frequency, posing very real safety and operational concerns. Currently, there is little meaningful recourse for air medical providers experiencing enhanced risks from UAS's, especially with recreational operators because of their exclusion from 2012 FAA Reform and Modernization Act.

The position of ACCT with regard to UAS operation includes the following:

**Definition of a UAS:** An Unmanned Aerial System (UAS) is defined as any self-propelled aerial vehicle, greater than .55 lbs, operating in the National Airspace System (NAS), operated without the possibility of direct human intervention from within or on the aircraft, which could cause harm to other aerial vehicles or persons on the ground, if not operated responsibly.

1. Require UAS separation from manned aircraft. In addition to the proposed requirements to “see and avoid” and “yield the right-of-way” to manned aircraft, the FAA must require UAS separation from manned aircraft and determine and define the appropriate separation distance in the rule.
2. Prohibit UAS operation within 1 NM of all public and private heliports and helipads such as those located on or near hospitals, police, and fire stations.
3. Apply the same requirements to UAS that exist for manned aircraft in relationship to the Next Generation Air Transport System (Next Gen).
4. Require UAS to operate with an omni-directional strobe light to appear more visible to manned aircraft operating in the same airspace.
5. Require UAS to operate with the same equipment and on the same equipment schedule as manned aircraft utilizing the National Airspace System, so that their GPS-derived position can be integrated with and available to manned aircraft traffic alert equipment.
6. The FAA should require advanced technologies, such as geo-fencing, to ensure UAS separation from airports, heliports, helipads, and other areas where manned aircraft are likely to operate. The ability to circumvent geo-fencing should be strictly controlled.
7. Require UAS packaging to clearly display what type of product is being sold and clearly inform the purchaser of his or her responsibilities.
8. The FAA should be responsible for the collection, management, and storage of UAS registration data, and this data must be available to the public in a manner consistent with the registration of any other aircraft.
9. Legislation should be enacted to establish enforcement and targeted criminal penalties for the dangerous misuse of UAS that fly near to or collide with manned aircraft.

10. UAS operating in controlled airspace should be restricted to flight below 200' in VMC conditions only.
11. FAA rules and regulations for UAV operations should be mirrored, supported, and adhered to by all UAV organizations and their members.
12. Congress should revise the 2012 FAA Reform and Modernization Act to allow the FAA to develop, implement, and enforce clear and appropriate rules and regulations for all UAS operations, including those considered "recreational."
13. Develop easily-accessible and understandable online training for UAS operators, including a short competency evaluation, to be required with every UAS registration.
14. Legislation and/or rule-making should allow for the safe elimination of a UAS operating illegally in the vicinity of a manned aircraft, or otherwise creating a hazard to manned aircraft or personnel on the ground, assuming the elimination can be done safely and without harm to others on the ground or in the air.
15. The FAA should develop a standardized system for reports of drone sightings and near-misses for all aviation sectors. Such reporting should be mandatory and available to the public for review.
16. The Helicopter Air Ambulance (HAA) industry should be an included member in ongoing and future discussions regarding UAS use.
17. All Apps used to assist UAS/drone operators in determining restrictions or requirements at the location where they intend to fly shall include all private and public heliports/helipads.