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October 28, 2015

The Honorable Susan Collins
Chairman
Subcommittee on Transportation, Housing
and Urban Development, and Related
Agencies
United States Senate
413 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Jack Reed
Ranking Member
Subcommittee on Transportation, Housing
and Urban Development, and Related
Agencies
United States Senate
728 Hart Senate Office Building
Washington, DC 20510

Dear Chairman Collins and Ranking Member Reed,

On behalf of the more than 1.1 million members of the National Association of REALTORS® (NAR), thank you for holding this hearing to review unmanned aircraft systems and the steps being taken to successfully integrate this technology into our National Airspace System (NAS).

The Federal Aviation Administration (FAA) has made significant strides towards achieving its goal of safely integrating unmanned aerial systems (UAS) into the national air space. Its proposed rule, issued in February 2015, was an important first step in making regulations which will allow for widespread commercial UAS use, while still protecting the safety and privacy of citizens and the NAS. Despite that progress, the FAA failed to meet its Congressionally-mandated deadline of September 30, 2015 for UAS integration. It is expected that the initial rule on commercial use of small UAS will not be released until mid-2016. Until that rule is in effect, many UAS operators will be left in a precarious position, struggling to do business in an environment without clear regulation.

NAR supports the FAA's safety-focused approach to this rulemaking, while recognizing the need for the final regulations to be released in a timely manner. NAR specifically seeks swift FAA action on the micro-UAS category, beyond visual line of sight operations, and standardized notice for UAS operations. The scaled-down compliance for the micro-UAS category proposed in the February 2015 rulemaking is proportionate to the operations capabilities and risk presented by these machines. The beyond visual line of sight operations are important to REALTORS® who work with rural properties, large farms, and unusually sized or shaped buildings.

Finally, the standardized notice for UAS operations is important because operators need a uniform way to communicate to neighbors and bystanders that a UAS operation is in progress in the community. More transparency and accountability built into the operations through the notice to community members is an important part of UAS integration.

Again, thank you for holding this hearing. NAR looks forward to the finalization of rules for commercial UAS use, and will continue working with the FAA and Congress to create a culture of safe and responsible commercial UAS operators.

Sincerely,



Chris Polychron
2015 President, National Association of REALTORS®

cc: United States Senate Subcommittee on Transportation, Housing and Urban Development,
and Related Agencies

