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October 1, 2015

Michael Huerta
Administrator
Federal Aviation Administration
800 Independence Avenue, SW
Washington, DC 20591

Dear Administrator Huerta:

The National Association of REALTORS® would like to acknowledge the FAA's hard work in its task to integrate the commercial use of unmanned aerial systems (UAS) into the national air space. The FAA was charged with difficult work: to safely integrate UAS into an already crowded airspace. The FAA has made significant strides in achieving this goal. The proposed rule issued in February 2015 was an impressive first step toward integrating commercial UAS into the national airspace.

Despite the advances that the FAA has made in this area, the FAA has not met its Congressionally-mandated deadline of September 30, 2015 for UAS integration. Many observers have pinpointed mid-2016 or early 2017 as when the FAA will release its initial rule on the commercial use of small UAS. This deadline still looms in the distance while many operators struggle to find footing in the regulatory quagmire created by the lack of a clear regulation and the prevalence of Section 333 waivers.

NAR supports FAA's safety-focused approach to this rulemaking. 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 (BVLOS) are important to REALTORS® who work with rural properties, large farms, and unusually sized buildings.

Finally, the standardized notice for UAS operations is important because operators need a standardized 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 integration.

NAR is committed to working together with the FAA to educate its members about responsible UAS use, and looks forward to educating the FAA about the real estate applications of this incredible technology.

Sincerely,



Chris Polychron
2015 President, National Association of REALTORS®

