

September 14, 2015

Chris Polychron, President National Association of REALTORS® 430 N Michigan Ave #4 Chicago, IL 60611

Dear Mr. Polychron:

On behalf of the more than 180,000 AMA members who fly model aircraft for recreation and educational purposes, I am writing today to share an analysis the Academy of Model Aeronautics (AMA) conducted on the FAA's recently released dataset of drone reports.

AMA takes safety very seriously and has provided guidelines and training programs to our members for nearly eight decades. As you know, we spearheaded the "<u>Know Before You Fly</u>" campaign with the Association for Unmanned Vehicle Systems International (AUVSI) to educate non-AMA members and newcomers to unmanned aircraft technology about how and where they should and shouldn't fly. We appreciate your organization's support of this program and look forward to continuing to work together to ensure the safety of our skies.

In order to better understand what's occurring, and what role AMA could play in advancing safe flying, our organization closely examined the 764 records that the FAA publicly released on August 21. What we found was a much more complex picture of the unmanned aircraft systems (UAS/drone) activity in the United States than what the FAA described in an August 12 press release headlined, "<u>Pilot Reports of Close Calls with Drones Soar in 2015</u>."

Without a doubt, there are some pilot reports of near misses that represent actual safety concerns, and more needs to be done to address those. But our analysis found that the number of "near misses" appears to be in the dozens, not the hundreds, based on the explicit notations in the FAA records. Moreover, the data contain several instances of military UAS crashes and mishaps. There are "sightings" of public entities and commercial operators that may be flying with or without authorization. Some reports of "sightings" may be of drones being operated responsibly pursuant to FAA guidelines, and some reported sightings of drones may not even be of drones at all.

There is some useful information in the FAA's dataset – data that could help guide policy conversations about drones and help all stakeholders identify solutions to mitigate true safety risks. But the data is only useful if the FAA takes the time to analyze and accurately characterize it; the same holds true for the media and others.

Attached to this letter is our full analysis of the report. Our analysis also contains two sets of recommendations for the FAA going forward – one set of recommendations relating to the FAA's handling of its drone data, and another set of recommendations to ensure the continued safety of the U.S. airspace.

As you read through the report, please let me know if you have any questions. I would appreciate the opportunity to talk with you and your colleagues further about our findings and discuss ways we can continue to work together to ensure the airspace remains safe for all aircraft.

Sincerely,

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Bob Brown President Academy of Model Aeronautics