



American Council of Engineering Companies of New York

**Comments to the New York Police Department
Re: Rules to create a public permitting process for the launching and landing of unmanned aircraft, including “drones,” within New York City
July 7, 2023**

The American Council of Engineering Companies of New York (ACEC New York) is an association representing nearly 300 engineering and affiliate firms with 30,000 employees across New York, with a concentrated presence in New York City. We thank the NYPD for this opportunity to submit comments on the proposed rule.

About ACEC New York: Founded in New York City in 1921, our association is one of the oldest continuing organizations of professional consulting engineers in the United States. Our members are the professionals who plan and design the structural, mechanical, electrical, plumbing, civil, environmental, fire protection, and technology systems for buildings and infrastructure across New York and the world.

ACEC New York, and many of our members, have a proud history of providing technical expertise to city agencies and officials as needed in order to update, advance and amend city laws and codes to address modern needs. For example, during the city’s last comprehensive Construction Code revision cycle (2017 – 2021), over 100 of our members supported the city’s work by volunteering their time and expertise through serving on the DOB’s Technical Committees convened to update the code.

Specific comments to the rule: Our Public Policy Committee reviewed the NYPD’s proposed rule to create a permitting process that will allow lawful take-off and landing of unmanned aircraft, including drones, in the city. **In general, we are in favor of this proposal as it is better to have this rule in place rather than the absence of a rule.** Our main constructive comments are as follows:

1. The 30-day notice before each flight is not practical. It is not possible to predict the exact flight details such as date, time, and the drone model a whole month ahead. A more reasonable request would be to reduce this notice period to **10 business days**.
2. The rule in Paragraph 24-05(e) that says operators must inform the local community board and City Council members at least 48 hours before taking any photos. Since operators take photos during every flight, this requirement seems excessive. The purpose of this notification isn't clear either. Furthermore, physically posting notices around the flight area seems unnecessary and impractical. Also, it is currently unclear whether operators can apply for flight permission online. There is also a risk of confusion if there is more than one flight in a day from different operators **It would be far more convenient and efficient if operators could submit an online application, and if the NYPD could maintain a publicly accessible online database showing all upcoming drone flights, so anyone concerned about flights in their area can check who is conducting them.**

The drone industry generally thinks it is best to follow [Federal CFR Part 107](#) - a set of national rules that cover all the important aspects of flying drones. More about these guidelines are available here: <https://www.droneprepared.org/>

Some aspects of the proposed rules, mentioned above, are excessive and impractical. We have offered recommendations to keep the rules' original intent intact while making them more practical and easier to follow.

If ACEC New York and our members' professional engineering expertise can be of assistance, please contact us at any time. Contact: Bill Murray, Vice President, ACEC New York, bill@acecny.org