

July 7, 2023

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New York Police Department Legal Bureau  
One Police Plaza, Room 1406  
New York, NY 10038  
c/o Agency Attorney Melanie Braverman

RE: COMMENTS OF NORTHEAST UAS AIRSPACE INTEGRATION RESEARCH ALLIANCE, INC. TO  
NEW YORK CITY'S PROPOSED RULE FOR PERMITTING UAS LAUNCH AND LANDING

To Whom It May Concern:

The Northeast UAS Airspace Integration Research Alliance, Inc. (NUAIR) submits these comments in response to New York City Police Department's (NYPD) request for comment on its proposed rule to establish a permitting framework for uncrewed aircraft (UA or drone) launch and landing operations in New York City. NUAIR has extensive experience operating UAS and we have worked closely with multiple state agencies throughout New York State (NYS) and beyond to establish uncrewed aircraft system (UAS) programs.

NUAIR is a Central New York-based nonprofit with a mission to safely integrate UAS into the National Airspace System (NAS), enabling scalable, economically viable commercial UAS operations. NUAIR has partnered with the FAA-designated New York UAS Test Site at Griffiss International Airport, Rome, New York, on behalf of Oneida County, and is responsible for the advancement of New York's 50-mile UAS beyond visual-line-of-sight (BVLOS) Corridor between Griffiss International Airport in Rome, New York and Syracuse International Airport. Indeed, NUAIR has been at the forefront of UAS operations research and development for the last decade.

The benefits of commercial and public UAS operations are substantial. UAS can provide enormous benefits in terms of safety and efficiency and the further integration of UAS into the NAS will bring significant safety and efficiency benefits to the American people. Whether UAS are being operated to support and maintain critical infrastructure, assist public safety efforts, or deliver medicine to rural and underserved communities, the United States is only just beginning to realize the full potential of UAS. UAS technology is already bringing substantial benefits to people's daily lives and innovative UAS use-cases are being developed every day that enhance public safety, help protect the environment and make our society more productive. The constituents of New York State can, and are, benefiting greatly from this innovative technology.

As a board member of the industry leading Commercial Drone Alliance and since its inception over 10 years ago, NUAIR continues to play a key role at the national level, and at the state and local level collaborating with multiple state agencies



throughout New York and beyond to develop and safely operationalize UAS operations as part of their day-to-day operations. To-date, NUAIR has performed thousands of UA flights and NUAIR has leveraged this experience to provide workforce development training to over 2,000 public safety officials in partnership with NYS Division of Homeland Security and Emergency Services (NYS DHSES). In addition to the work NUAIR has completed with NASA, FAA, NUAIR has assisted various state agencies with obtaining 164 waivers, exemptions and other operational approvals from the FAA. Additionally, NUAIR has supported the launch of over 80 state agency UAS programs, including programs for:

- NYS Department of Transportation (DOT);
- Port Authority of New York and New Jersey (PANYNJ);
- State University of New York (SUNY) Upstate Medical;
- New York Thruway Authority (NYSTA); and
- New York Power Authority (NYPA).

In this spirit, we are pleased to see New York City's recognition of the benefits of commercial drones. While we believe certain aspects of the proposed permitting framework may be preempted by federal regulation, NUAIR is generally supportive of the City's efforts to modernize its Administrative Code to eliminate barriers that currently prohibit UAS operations in the City. To that end, NUAIR has a significant amount of experience and expertise that may be of value to the City as it works to integrate civil and public UAS operations. For example, the proposed permitting framework could benefit from real-time innovative processes and approvals akin to the FAA's Low Altitude Authorization and Notification Capability (LAANC) system. In this spirit, NUAIR could assist with the development and implementation of a more automated and streamlined permitting process for enabling UA launch and landing operations in the City. Should the City wish to explore a more streamlined and innovative permitting approach, we would be glad to assist the City in those efforts.

NUAIR thanks the City for its consideration of these comments and we look forward to continued engagement with the City and other agencies throughout NYS to further integrate safe UAS operations into the NAS.

Sincerely,

*Ken Stewart*

Ken Stewart

Chief Executive Officer