

# Vaughn College

of aeronautics and technology

June 29, 2023

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

Dear Ms. Braverman,

I write in response to the proposed rules for drone operations in New York City. As the president of Vaughn College of Aeronautics and Technology, I am thrilled to serve a population of students who represent the diversity of our city and who pursue high-paying positions in aviation and aerospace including the drone industry.

Since 1932, Vaughn College has offered certifications and degrees in all aspects of aviation, engineering, management and technology. Our founders were early aviation pioneers, and our current students are achieving positions with airlines, manufacturers, airports, public utilities and the NYPD as pilots, aviation maintenance technicians and officers. Many of our students are also working in New York City for drone manufacturers such as DJI and Easy Aerial. More than 80 percent of our students come from underrepresented and under resourced backgrounds.

Vaughn is currently working with high schools in Brooklyn and Queens to offer five courses that lead to Part 107 certification as drone pilots. This grant is being funded by the Federal Aviation Administration. The great difficulty is where to allow these students to practice their training within the confines of New York City. Incredibly small pockets of land are available, and the current proposed rules are untenable for students to meet in order to pursue their potential career goals.

I would like to suggest that the new proposed rules also include an exception for students and be structured like the NYC rule for student filmmakers. Students would still need a permit but would be granted permission based on the institution they attend, and provided that the institution also ensures permission. In the case of Vaughn College, we understand the safety issues surrounding safe drone flying and would work with our students to confirm that they are following all applicable rules and guidelines.

By not having an exception for students who are piloting drones, New York City will continue to limit an incredible career path for students in the flight, manufacturing and managing of safe drone operations. Underrepresented and underserved students deserve the opportunity to share in this sector which is forecast to grow commercially from about \$43 billion in revenue in 2023 to \$584 billion by 2030 according to Grand View Research (<https://www.grandviewresearch.com/industry-analysis/global-commercial-drones-market>). “That growth is directly tied to favorable government initiatives regarding the advancement in drone technology coupled with the growing demand from businesses for drone-acquired data,” also according to Grand View Research.

In closing, I appreciate New York City's willingness to look at the rules governing drones and respectfully request that we provide an exception that will allow ALL students—not just those in surrounding regions where restrictions are limited—to share in the prosperity and opportunity that exists in this exciting and growing industry.

Please feel free to reach out if I can provide any further information at 718.429.6600 x102 or [sharon.devivo@vaughn.edu](mailto:sharon.devivo@vaughn.edu).

Cordially,

A handwritten signature in black ink that reads "Sharon B. DeVivo". The signature is written in a cursive, flowing style.

Sharon B. DeVivo, EdD  
President and Chief Executive Officer