

Academy of Model Aeronautics

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January 31, 2020

Senator Roger Wicker, Chairman
Senate Committee on Commerce, Science,
and Transportation
555 Dirksen Senate Office Building
Washington, DC 20510

Congressman Peter A. DeFazio, Chairman
House Committee on Transportation and
Infrastructure
2134 Rayburn Office Building
Washington, DC 20515

Senator Maria Cantwell, Ranking Member
Senate Committee on Commerce, Science,
and Transportation
511 Hart Senate Office Building
Washington, DC 20510

Congressman Sam Graves, Ranking Member
House Committee on Transportation and Infrastructure
1135 Longworth HOB
Washington, DC 20515

Dear Members of Congress:

We are a coalition of aviation associations, hobby shops and manufacturers writing to express our deep concern for the future of the model aviation hobby industry, the many jobs that support it – and most importantly – the future pilots, engineers and aerospace experts.

As a result of increased regulation and new rules for recreational UAS operators, the model aircraft hobby is shrinking, businesses are closing, jobs are disappearing, and young people are turning away from the hobby of flying model airplanes. Not only does this negatively impact our existing community of responsible and safe model aircraft hobbyists, it will be devastating to the broader aviation industry. The situation demands immediate attention: we urge you to reconsider policies, such as the current remote ID proposal, that disincentivize participation in model aviation.

As you may know, the aviation industry today faces a growing, global pilot shortage, which Boeing has said is “one of the biggest challenges” facing the airline industry.¹ Echoing this message, FAA Deputy Administrator Dan Elwell recently remarked that, “There needs to be a common understanding of the gravity and urgency of this situation. We have a diminished supply of

¹ Sam Meredith, “Boeing CEO says a global pilot shortage is ‘one of the biggest challenges’ facing the airline industry,” *CNBC*, June 18, 2019, <https://www.cnbc.com/2019/06/17/boeing-ceo-says-global-pilot-shortage-is-one-of-the-biggest-challenges.html>.

² Elwell Remarks at the FAA’s 2018 Aviation Workforce Symposium available at: <https://www.facebook.com/FAA/videos/481356379013845/>

qualified pilots, mechanics and technicians.”² There is no doubt that the aviation industry is facing a serious challenge in this regard.

Model aviation is the natural precursor to careers in aviation, including as commercial pilots and engineers and more. Our hobby provides young people with an opportunity to experience the joy of flight while at the same time studying the fundamentals of physics, math and aviation. There is simply no replacement for model aviation’s ability to capture the hearts of young people and convert that into lifelong careers as the aviators and engineers the U.S. desperately needs. Take for example how model aviation was instrumental in launching the careers of astronauts Neil Armstrong and Spaceship One designer Burt Rutan.

Furthermore, model aviation supports a \$1 billion hobby industry responsible for thousands of U.S. jobs. Across the U.S., businesses both big and small sustain the hobby, providing the supplies needed to fly model aircraft and helping to create a close-knit community of likeminded enthusiasts. Historically, the model aviation hobby has been much larger than what it is today. According to shop owner and chairman of the National Retail Hobby Store Association, Jeremy Truxillo, his hobby store reports a 60% decrease in model aviation sales since 2015. This is just one example of the many stores across the country who have seen similar declines in sales due to unnecessary and burdensome regulations. And while we understand that the hobby may never return to the size of previous decades, we urge you to work collaboratively with us to curb additional decline – job losses that will continue if the regulatory burdens continue to squeeze the hobby out of existence.

Truxillo further describes the impact increased regulations have had on the hobby:

*Since the government started regulating model aviation our aircraft sales have fallen significantly. Less and less consumers want to invest in products that they feel in the future they may not be able to use. Government regulations not only hurt the hobbyist but also hurt thousands of small businesses that rely on model aviation sales. Without model aviation, those businesses will close and many jobs will be lost. Model aviation is a vital part of our future. It encourages children to pursue careers in engineering, science and aviation. We need to preserve the hobby.*³

The last five years have been especially challenging for the hobby of model aviation as increased regulations and new legislation have disincentivized participation in the hobby. In a recent survey of hobby shops, about 77% of respondents said FAA UAS regulations have hurt their sales either somewhat or drastically and almost 70% said that FAA regulations are the biggest threat to the model aircraft industry.⁴

We are writing to you now because what were intended to be minimally burdensome requirements have, in fact, become very much so. Since 2015, regulations have steadily increased on model aviation hobbyists. It began with the requirement to register all UAS and it has now evolved into requirements to seek authorization to fly in almost every instance. In addition, we

³ Statement provided to the Academy of Model Aeronautics on November 21, 2019

⁴ Academy of Model Aeronautics Survey: Impact of FAA UAS Regulations, November 25, 2019, <https://www.surveymonkey.com/results/SM-3F5GMSGW7/>

can no longer fly at night and are restricted to altitudes that are unsafe in many cases. Now, we are facing a proposal on remote identification of UAS (remote ID) which would be devastating to our community.

As written, the proposed remote ID rule would seriously disincentivize participation in the model aviation hobby. Our coalition is concerned that some elements of the proposal would impose significant costs on the model aviation community and unnecessarily restrict existing, safe model aircraft operations.

Specifically, we are asking the FAA to address the following concerns with the proposed remote ID rule:

- First, the rule should provide community-based organizations (CBOs), like AMA, more flexibility to establish and maintain fixed flying sites that satisfy remote ID compliance.
- Second, the rule should create a pathway for remote ID compliance at AMA events and competitions, which may not take place at fixed flying sites.
- Third, the rule should account for situations where there is no internet connectivity, as many safe places to fly are in rural areas with little or no service.
- Fourth, the rule should revise the definition of amateur-built UAS to effectively delineate the categories of aircraft.
- Finally, the rule should not require modelers to register every aircraft individually.

We need Congress and the FAA to work collaboratively with us to stem the decline of model aviation, U.S. jobs and the broader aviation industry. This starts with a better rule on remote ID.

Sincerely,





31

