



AMERICAN PUBLIC WORKS ASSOCIATION

Your Comprehensive
Public Works Resource

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March 2, 2020

Mr. Ben Walsh
Flight Technologies and Procedures Division
Federal Aviation Administration
470 L'Enfant Plaza SW, Suite 4102
Washington, DC 20024

Re: Docket number FAA-2019-1100-Remote Identification of Unmanned Aircraft Systems

ATTN Mr. Walsh:

On behalf of the more than 30,000 members of the American Public Works Association (APWA), APWA appreciates the opportunity to submit comments to the Federal Aviation Administration (FAA) regarding remote identification of Unmanned Aircraft Systems (UAS) or drones. APWA includes not only personnel from local, county, state/province, and federal agencies, but also private sector personnel with direct oversight and involvement in the transportation, environmental, emergency management, and water issues for their respective organizations. Our members take the responsibility of providing comments on proposed federal regulations very seriously and are constantly looking for avenues to submit constructive input either in person or by written correspondence.

Recently we had the opportunity to meet with Mr. Jay Merkle, Executive Director of the Federal Aviation Administration (FAA) Unmanned Aircraft Systems (UAS) Office of Integration. During our meeting we discussed the ever evolving impact of UAS in the many facets of our daily lives and the important role that public works professionals will play as a result of this changing landscape. This proposed rule will impact public works in the following ways:

- As first responders, public works professionals frequently require notice as to when UAS may be actively used in the area as this could directly impact how these professionals carry out their responsibilities. This would include protecting critical infrastructure from either malicious or accidental drone incursions.
- Public works professionals also have a responsibility to share information with the general public on issues ranging from emergencies, such as search and rescues to general infrastructure projects including but not limited to, sewer and drain explorations, bridge and road inspections, and monitoring roadway incidents. Properly identified UAS can prove extremely beneficial in these situations.
- APWA certainly understands that the process for creating and implementing policies to incorporate UAS into our daily lives will be just that, a process. We further believe that public works will have a vital role in the use of UAS as we all move forward in breaking new ground.
- Public works professionals place a major emphasis on mitigation and communication, as highlighted in our policy priorities which are focused on emergency management, transportation, and water resiliency. A copy of each have been attached for your reference. Being able to communicate efficiently and effectively between emergency responders, including public works, is critical for preparedness, response and recovery operations.

PRESIDENT
William E. (Bill) Spearman III, P.E.

CHIEF EXECUTIVE OFFICER
Scott D. Grayson



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APWA members pride themselves on being committed to public service and being a resource for federal initiatives is just another way we work to protect our communities. APWA looks forward to continuing to work with the FAA to share information with our membership as well as provide comments on proposed federal regulation and rulemaking. Thank you again for this opportunity. If APWA may be of further assistance, please contact Marty Williams, APWA Government Affairs Manager, at mwilliams@apwa.net or 202-218-6732.

Thank you for your time and consideration of these comments.

Sincerely,

Scott D. Grayson
CEO
American Public Works Association

Sincerely,

William E. (Bill) Spearman III, PE
President
American Public Works Association

PRESIDENT
William E. (Bill) Spearman III, PE.

CHIEF EXECUTIVE OFFICER
Scott D. Grayson