



November 6, 2015

Mr. Earl Lawrence  
Director  
UAS Integration Office  
Federal Aviation Administration  
800 Independence Avenue, SW  
Washington, DC 20591

Submitted via [www.regulations.gov](http://www.regulations.gov)

Subject: National Association of Broadcasters Comments to *Clarification of the Applicability of Aircraft Registration Requirements for Unmanned Aircraft Systems (UAS) and Request for Information Regarding Electronic Registration for UAS*, Docket No. FAA-2015-4378

Dear Director Lawrence:

The National Association of Broadcasters (“NAB”) is pleased to submit comments in response to the Federal Aviation Administration (“FAA”) Request for Information Regarding Electronic Registration for Unmanned Aircraft Systems (“UAS”). NAB is a nonprofit trade association that advocates on behalf of local radio and television stations and broadcast networks before Congress, the FCC, other federal agencies, and the courts. NAB appreciates and supports the FAA’s continued efforts to develop rules that balance the need to ensure public safety with the positive benefits of UAS.

The benefits of UAS in the news and entertainment industries are significant. UAS will expand the possibilities for capturing informative and engaging images, delivering both vital information and captivating entertainment to millions of Americans. The use of UAS will permit safer, less expensive, and better journalism and video production. UAS will provide television stations in smaller markets with an unprecedented opportunity to offer aerial coverage while also allowing stations in larger markets to supplement, or even replace, their current aerial capabilities, better enabling journalists to inform the public and alert government first responders.

1771 N Street NW  
Washington DC 20036 2800  
Phone 202 429 5300

NAB agrees with the FAA that in order for the UAS industry to develop to its full potential, we must ensure that it develops safely. To that end, UAS registration is a reasonable step to mitigate the dangers posed by a small minority of hobbyist UAS operators that are flying in a careless and reckless manner that endangers the public. In addition, NAB is pleased that the archaic paper-based registration system for commercial operators will be replaced by an electronic registration system. However, for this effort to succeed, the FAA must ensure that this new registration system is simple, straightforward, user-friendly and seamless for the operator.

NAB also agrees with the FAA that the current paper-based system for aircraft registration is too burdensome for UAS operators, and fully supports FAA efforts to modernize the process. A streamlined, web-based registration system for small UAS that is easy to use will facilitate compliance with the registration mandate and ultimately enhance safety and accountability. The FAA knows how to do this—the online aircraft N-number reservation system is simple and could serve as a model for an electronic-based registration system for small UAS.

If implemented correctly, small UAS registration will help make the skies safer, and in doing so, promote the continued growth of commercial UAS operations for newsgathering and other video production. NAB appreciates the opportunity to provide these comments and looks forward to the FAA's continued efforts to finalize the small UAS rules and unleash the true potential of this technology for journalists and newsgatherers across the country.

NATIONAL ASSOCIATION OF BROADCASTERS



By: \_\_\_\_\_

Rick Kaplan  
Curtis LeGeyt  
1771 N Street, NW  
Washington, DC 20036  
(202) 429-5430