

FPVFC FAQ on FAA Remote ID NPRM - December 2019

1. **What is Remote ID?**

Remote ID is akin to an electronic license plate. The idea is with information being transmitted from a UAS, the FAA, law enforcement and the public may find out information from a UAS flying near them.

2. **When would these changes take effect?**

That depends on when the FAA publishes the final ruling on remote ID. We have 60 days from December 31, 2019 to submit comments. The FAA will then review the comments and publish a final report. This NPRM suggests that the rules will take effect 60 days after that. 2 years after the rules take effect, any drone sold in the US will need to comply with the regulations and 3 years after the rules take effect all drones no matter when they were purchased or built will need to comply. See page 184 for details.

3. **How does this relate to drones under 250g?**

Any drone under 250g or .55lbs, flown recreationally, is not required to register with the FAA and only drones that are required to register are subject to these proposed remote ID regulations. For example, for commercial (Part 107), you must register your drone. For recreational use if your drone is under .55 pounds, you do not have to register it.

4. **What about model aircraft? Are they included in this regulation?**

Yes, model aircraft are considered UAV's by the FAA and subject to the same regulations as "drones".

5. **If I build my own drone, will it be subject to these remote ID regulations?**

Yes if over 250g or if flown under part 107. In fact, if you build your own drone from anything except a kit which contains 100% of the components, your drone will by definition be an "Amateur-Built" drone and it may only be flown in an FAA-recognized identification area (FRIA's).

6. **If my drone is broadcasting my location, what is stopping someone from looking up my location and assaulting me while I am busy flying my drone?**

Personal information such as name and phone number will only be available to the FAA and law enforcement. However, the latitude and longitude of the aircraft will be publicly broadcast throughout the flight for a Standard and Limited Remote ID UAS. The latitude and longitude of the operator will be publicly transmitted throughout a flight for Standard Remote ID UAS and initially for a Limited Remote ID UAS.

7. **How will this affect where I can and can't fly?**

That depends on what you are flying and what level of remote ID your UAV supports.

- If your drone is not remote ID capable, you will be limited to flying in only FAA-recognized identification area (FRIA's).

- If your drone can share its location over the internet and meet the specifications for a Limited Remote ID craft, then you can fly within a 400' sphere of your location.
- If your drone can meet all the requirements for Standard Remote ID, there are no new limitations on where you can fly.

8. What are the costs associated with using remote ID and a USS?

The FAA estimates that each person will pay the USS \$30 per year to use a remote ID service provider or USS. See pages 103 and 196.

9. It says that recreational flyers will have to register each individual drone. Does that mean I will have to pay \$5 to register every drone I own?

Yes, as stated on page 210 of the NPRM.

10. If my drone does not support remote ID, what are my options? Where can I fly?

If your drone does not support remote ID you are limited to flying from and within the boundaries of a FAA-recognized identification area (FRIA).

11. What is a FRIA?

FRIA stands for "FAA-recognized identification area". A community based organization like the FPVFC or AMA can request specific locations, like their local AMA flying field, be approved by the FAA as a recognized identification area. When flying within the boundaries of a FRIA, your drone would not be required to have remote ID.

12. Why can't more FRIA's be requested 12 months after this goes into effect?

It appears to be the FAA's opinion that in the future, ALL drones will be equipped with remote ID and the need for a FRIA will disappear as UAVs without remote ID are "phased out". See page 174 of the NPRM.

13. Do all RC aircraft fall under this rule?

The NPRM states that any UAV that is required to register with the FAA must comply with the remote ID regulations. In short that means any RC aircraft between .55lbs and 55lbs, flown recreationally, fall under this rule. As do all RC aircraft under 55lbs flown commercially under part 107.

14. What size drone would typically be under 0.55 pounds? Propeller sizes of 5", 3", 2" etc.

As the weight limit of 0.55 pounds includes everything flying, today's UAS of 5" are significantly over this threshold and often 2" and 3" are under the 0.55 pounds.

15. Will remote ID interfere with FPV signals on 2.4ghz and 5.8ghz? What about 72Mhz and 50Mhz?

Part of the means testing by the Producer of a manufactured UAS is to ensure there is no interference with the command and control signal from the remote ID connections. The FAA intends the broadcasts to be received by the public with a mobile device. Mobile devices don't currently receive signals at 72mhz or 50mhz so it would be unlikely that the

remote ID signals would interfere there.

16. How will the FAA protect our privacy?

“Cybersecurity” - Seriously, the FAA states that they will require cybersecurity but do not define what that is. See page 142.

This is a good point and one the FPVFC will call out in comments to the FAA. While personal information will be held by the RID USS and FAA and not broadcast, the location of the UAS and the operator will be publicly broadcast for Standard and Limited Remote ID UAS.

17. If I am a Part 107 pilot, can I fly drones that are under 250g (0.55 pounds) if they don't have remote ID capabilities?

No. Any drone that is required to register with the FAA must comply with the remote ID regulations. Since Part 107 pilots must register every drone, regardless of weight, even sub 250g (0.55 pounds) drones must comply with remote ID regulations if flown under Part 107.

18. What are the rules for kit manufacturers and kit retailers? Will they be able to sell kits that can fly anywhere other than in FRIA sites?

- If a kit contains 100% of the components required to assemble the UAS and the producer (manufacturer) is approved by the FAA, the kit can be a Standard or Limited Remote ID UAS.
- If the kit contains less than 100% of the components, it is deemed amateur-built and is therefore restricted to fly in an FAA Approved Remote ID Area (FRIA).
- The Producer of a Standard or Limited Remote ID UAS is required to apply a serial number to each UAS and is required to gain approval by the FAA proving they as a producer pass means tests to ensure quality and function required for either a Standard or Limited Remote ID UAS.
- There is no reference to retailers in the NRPM. It appears the responsibilities under the Remote ID NRPM fall to the Producer, the Owner and Operator (operators may be a different person or company from the owner).

19. How many people fly FPV UAS in the United States?

- The FAA estimates recreational UAS at 1.3 million growing at 6 to 7% per year over the next few years. From our (FPVFC) experience in the FPV industry, we estimate there are upwards of 150,000 to 200,000 FPV fliers in the United States. This represents between 12% to 15% of all recreational drones.
- This is important to us as FPV fliers because in comparison, the AMA with 200,000 members recently gained the FAA's agreement to consider raising the 400 foot Above Ground Level (AGL) limit for AMA flying fields after the AMA created a call to action for their members to contact their Congressional Representatives and Senators.
- In the NPRM, the number of Do-it-Yourself fliers to be a small fraction of the total. This assertion guides much of the rationale on why a FAA Approved Remote ID Area (FRIA) makes sense for all unequipped UAS. We in the FPVFC do not think

a FRIA as currently structured, makes sense.

20. What financial gain does the FPV Freedom Coalition get from the Remote ID NRPM?

None. The FPVFC is a not-for-profit, non-stock corporation. Currently, all employees of the FPVFC are volunteers. The money raised from dues and T-Shirts has been used for expenses (mostly IT and government fees) as well as some travel.

21. What has the FPVFC done in 2019 to help me, an FPV flier?

- The FPVFC has responded to a NPRM in April of 2019, a ANPRM in April 2019, has participated in the Remote ID Tasking Sub-Group of the FAA's Drone Advisory Committee. In addition, the FPVC is currently leading a DAC Sub-Group on Spectrum/C2 and participating in another DAC Tasking Group on UAS Facility Maps. The FPVFC was also recently among the 12 companies selected to assist the FAA in determining requirements to administer the Recreational UAS Knowledge Test. The FPVFC is disappointed in the FAA's Remote ID NPRM which ignored the Aviation Rule Committee, the Remote ID DAC Sub-Group and Section 374 of their Congressional Reauthorization.
- The FPVFC has also held Town Halls to listen to and discuss requirements of the FPV Community. These Town Halls have shaped the FPVFC's responses to the FAA on RFI's and NPRM comments.
- The FPVFC has also created educational material, especially Safety Guidelines which are required to carry when flying recreational UAS.