

The United Drone Network (UDN) is a diverse coalition of trade associations representing a broad spectrum of industries who both manufacture Unmanned Aircraft Systems (UAS)/drones as well as depend on them in regular business operations. We support the safe and responsible use of drones, however, drones can also pose challenging safety and security risks. There is no doubt that drone technology is advancing rapidly and drones have a bright future as long as they are used appropriately.

### **Advancing Technology and Innovation**

The use of drones and advances in UAS technology are on the rise. Currently, drones are beneficially used by a wide range of industries. In the wake of natural disasters such as Hurricane Katrina, drones were used for search and rescue operations. Many industries such as the agricultural and explosives industries rely on drones to monitor crop conditions, as well as assess the safety of re-entering post-blast sites at mines and quarries, respectively. Even Amazon and UPS have considered using UAS for package delivery. Critical infrastructure such as pipelines, refineries, and petrochemical facilities also benefit from the use of drones in a variety of ways. Drones have been used to inspect pipelines for leaks, examine flare stacks for maintenance issues, and even assess tanks when it would be too dangerous for a person to enter. As drone technology becomes more sophisticated, the services UAS provides are likely to expand. Permitting drones to fly beyond the line of sight of operators and allowing their use at night are examples of technological advances that would greatly benefit industry.

### **Protection of Critical Infrastructure**

There have been numerous incidents of drones conducting unauthorized flights over critical infrastructure. Some fly-overs may be by unknowing hobbyists. However, drones can be used for surveillance or mapping of a critical infrastructure site. Drone video footage of our nation's critical infrastructure has been posted to websites such as YouTube without consent of the owner/operators of the facility. As such, bad actors could use this information for nefarious purposes—specifically to attack critical infrastructure. There are also real and present safety concerns with unauthorized drones flying over or making contact with a critical infrastructure facility. A drone that loses control and crashes, or if it is armed, could cause significant damage and injury.

### **Federal Preemption**

State legislatures across the country have been particularly active moving UAS legislation forward. In 2015, 45 state legislatures considered over 160 bills related to drones. While not all of these bills passed their respective state legislatures, it is important to recognize that drone issues are gaining increased attention at the state level. For example, five states—Arkansas, Florida, Louisiana, Nevada and Texas—passed legislation that addresses unauthorized drone fly-overs. We strongly encourage Congress to follow the example set by these states and take the lead on this issue.

A streamlined, national policy approach on the use of drones would be more effective. While we recognize that the Federal Aviation Administration's Notice of Proposed Rulemaking (NPRM) would provide safety rules for small UAS (under 55 pounds) conducting non-recreational operations, the NPRM fails to address the unauthorized use of drones near or over critical infrastructure facilities. A patchwork of differing state laws and regulations will ultimately make compliance more difficult—for both UAS manufacturers and users.

We support the use of drones in as many different applications as possible and we do not want to limit this new innovative technology. However, if there are no limits on where a drone may fly, we are concerned that an incident at a critical infrastructure site will force limiting technology onto the UAS industry. Policy makers must act to prevent unauthorized drone operations because of the potential

safety and security risks they can clearly pose to facility operations, workers, and surrounding communities.

We strongly urge Congress to address the unauthorized use of drones this year as part of its efforts to reauthorize the Federal Aviation Administration.

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