AMA D1 NPRM FLYING SITE COMMENTS

My name is Andy Argenio and I am writing today not as an Academy of Model Aeronautics Executive Board Member but as the Chairperson of AMA's Advanced Flight Systems Committee that's responsible for developing safety programming for new and emerging technologies and their utilization in model-aircraft. I am deeply concerned that the proposal would dramatically impact the model aviation community and unnecessarily restrict existing, safe model aircraft operations.

I am concerned that the rule arbitrarily limits the number of approved sites and prohibits the establishment of new sites. As such, the rule appears designed to phase out these sites over time, rather than treat them as a viable long-term option for complying with remote ID.

Furthermore, AMA club flying sites for over a half century have provided the bases for AMA's safety programming to reach each and every member through the club's safety officers/marshals, flight instructors, model-aircraft inspectors, contest/event director and members who all contribute to risk mitigation by ensuring that everyone operates a model aircraft in accordance with AMA's guidelines and rules, FAA's regulations, local laws and club rules. 90% of AMA members fly model airplanes that need a RUNWAY in rural open and unobstructed fields so flying sites are precious asset we would not be willing to give up. In fact the government should be helping us to acquire more flying sites rather than threatening to phase them out.

I encourage the FAA to view fixed flying sites as part of a viable long-term solution to remote ID and to amend the rule to allow for the establishment of new sites in the future.

Second, the FAA must create a pathway for remote ID compliance at AMA events and competitions, which may not take place at fixed flying sites. These events take place in defined locations for a short period of time, like an air show. For remote ID compliance purposes, they should be treated like fixed flying sites. I encourage the FAA to create a light process for event organizers to apply for and receive, waivers from remote ID requirements for these ad hoc events and competitions, many of which support local charities.

Third, the rule must consider hobbyists who fly in rural areas with little or no internet connectivity. As I read the proposed rule, I could be required to have an internet connection even if flying at an approved fixed flying site in a rural part of the country. Unfortunately, some rural areas don't have adequate cell service, which means I could not be able to fly under the limited remote ID option. Rural locations are frequently the safest places to fly because they are away from people, other aircraft and structures. The FAA needs to provide a solution for these areas, such as the ability to comply from home or other WIFI-enabled locations.

Finally, the FAA should reconsider the proposal to register each aircraft, which will impose a cost and compliance burden on the model aviation community. While individual registration may make sense for beyond line of sight operations, it is an unnecessary requirement for aircraft designed to be flown within line of sight. We build and fly model airplanes because it is a passion; and many of us own dozens, if not hundreds, of aircraft of different shapes and sizes, some of which we fly infrequently. The time and cost involved in registering each model

individually would be substantial and runs counter to the current registration framework for recreational operators. Also, aircraft that are built by hand do not have serial numbers, which makes individual registration more difficult.

Again, I urge you to carefully consider and address my concerns about the remote ID proposal. Model aviation is the natural precursor to careers in aviation, including commercial pilots and engineers and more – jobs which the U.S. desperately needs to fill. Model aviation supports a $1 billion hobby industry responsible for thousands of existing U.S. jobs. We simply cannot afford to further harm the model aviation hobby with overly burdensome requirements.