



Bob Brown
President

June 21, 2014

Gary Fitch
Executive Vice President

Mr. Kelly J. Fredericks, President & CEO
Rhode Island Airport Commission

Keith Sessions
Chief Financial Officer

2000 Post Road
Warwick, RI 02886

Andy Argenio
District I
CT, ME, MA, NH, RI, VT

Mr. Fredericks:

The Academy of Model Aeronautics (AMA) is a national membership organization of more than 165,000 model aviation enthusiasts. By way of introduction, my name is Andy Argenio. I am an AMA district vice president and a long-time resident of Rhode Island.

Eric Williams
District II
NJ, NY, Europe

Mark Radcliff
District III
OH, PA, WV

I write today concerned over a June 12, 2014 news release issued by your agency relating to Unmanned Aircraft Systems (UAS), and specifically the statement that RIAC is *“providing notice that UAS operators must request permission from the Federal Aviation Administration prior to operating any drone within Rhode Island”*.

Bliss Teague
District IV
DE, DC, MD, NC, VA

By definition, radio controlled model aircraft are unmanned aircraft systems. The word “drone” is used by many to refer to all types of UAS, sometimes including model aircraft. We are concerned that your statement may be interpreted by some to include RC models flown for recreational purposes.

Kris Dixon
District V
AL, FL, GA, MS, PR, SC,
TN, VI

AMA members host a number of model aviation airshows each year that attract thousands of visitors. In addition, members also volunteer their time to provide aeromodeling demonstrations at other events. One example is the South County Balloon Festival in Kingston, RI that attracts tens of thousands of visitors annually. Radio controlled model demonstrations have been an integral part of that event for decades.

Randy Cameron
District VI
KY, IL, IN, MO

Since 1981, model aircraft have operated in the National Airspace under the guidance of an FAA Advisory Circular AC 91-57. AC 91-57 is advisory in nature, not regulatory, and provides minimal recommendations for model aircraft activities.

Tim Jesky
District VII
IA, MI, MN, WI

Mark Johnston
District VIII
AR, LA, NM, OK, TX

In addition section 336 of the 2012 FAA Modernization and Reform Act states that, *“Notwithstanding any other provision of law relating to the incorporation of unmanned aircraft systems into Federal Aviation Administration plans and policies, including this subtitle, the Administrator of the Federal Aviation Administration may not promulgate any rule or regulation regarding a model aircraft, or an aircraft being developed as a model aircraft if.... the aircraft is flown strictly for hobby or recreational use; ...”*

Jim Tiller
District IX
CO, KS, NE, ND, SD, WY

Lawrence Tougas
District X
AZ, CA, GU, HI, NV, UT

Chuck Bower
District XI
AK, ID, MT, OR, WA

In short, there is no requirement that the operators of model aircraft receive prior permission from the FAA to fly their models.

As a nationwide membership organization, AMA fully supports RIAC's effort to manage the operation of UAS over unprotected people and property for photography and video purposes at open air events. In fact, in 2012 AMA incorporated a statement regarding this in its safety programming.

We do, however, seek clarity and an assurance that RIAC's position on this issue is not intended to include recreational aeromodeling. Such a position would have a significant negative impact on those that enjoy model aviation for hobby and sport.

I would appreciate a response to my letter and am available should you have any questions. I can be reached at 401-575-6215.

Sincerely,

Andy Argenio
District I Vice President
Academy of Model Aeronautics