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COALITION**
*A Partnership for
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**EUROPEAN
SMALL UAV
COALITION**



August 28, 2015

Mr. Eric Sivel
Chairman of JARUS
European Aviation Safety Agency (EASA)
Postfach 10 12 53
D-50452 Cologne
Germany

Dear Mr. Sivel:

As you are well aware, the RPAS industry has been instrumental in working closely with regulatory authorities on the development of regulations to ensure that RPAS will be able to operate safely in civil airspace. Our industry was similarly looking forward to full and direct participation in the JARUS process, as that organization moves forward on organizational, governance and regulatory issues. At the JARUS meeting in Dublin this past April, the UAS industry actively participated and fully believed that JARUS was committed to increased industry involvement in its proceedings and activities. In fact, the procedures agreed to in Dublin were designed to foster this increased input and participation from the industry.

Unfortunately, industry does not feel that JARUS is encouraging industry presence at the upcoming JARUS Stakeholder Consultation Body (SCB) meeting in Beijing in a form consistent with what all parties envisioned at the Dublin meeting.

First, it is not clear how JARUS resolved or dealt with the comments it asked prospective SCB members to provide regarding the draft SCB Terms of Reference. Many of our members believe that the format JARUS proposed was intentionally limiting and short-sighted.

This lack of response to our comments and your proposal to “adopt the official decision”—even though JARUS leadership has “not been able to finalize the decision making process before the JARUS plenary” in Beijing—leads us only to believe that JARUS is neither serious nor sincere about industry partnership or even our participation. Further, it has the negative effect of placing the burden of industry coordination and collaboration on this SCB for the global RPAS community.

Second, the extremely short notice and late formal invitation to potential SCB members has made attendance, and obtaining visas, almost impossible. While we appreciate that the planning and logistics of such a meeting might be burdensome, the lack of advanced contact with stakeholders has almost assured that RPAS industry participation will be minimal, if not non-existent. Your recent message makes it clear that JARUS now intends to only finalize the “decision making process” on the SCB in a closed session on 7 September and is asking that the SCB hold a session to determine the details of its governance on 8 September. With minimal industry participation now almost assured, this planned meeting of the SCB would not be in any way representative of the rapidly growing RPAS industry.

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Industry participation in the development of aviation policies and regulations has a long and fruitful history in both the EASA and FAA systems, among others. This mutually beneficial partnership between manufacturers and regulators has produced an unparalleled level of aviation safety in North America and Europe and is, in fact, the cornerstone of our regulatory regimes. As the RPAS industry grows and develops, such interaction between manufacturers and aviation regulatory authorities is critical to ensure that this nascent aviation sector produces similarly safe results.

Any meeting that, by practice or design, excludes a large proportion of SCB members is neither in the spirit of past practices of EASA or FAA nor beneficial toward developing a strong RPAS safety partnership going forward. We would respectfully ask that you, as JARUS Chairman, consider postponing the September SCB meeting to a later date when a meeting of stakeholders would be much more representative of the industry as a whole. In this manner, we could move forward knowing that the tradition of participatory rulemaking has not been abandoned or ignored by JARUS, but continues to be fostered under your leadership.

Thank you for your kind consideration of this request.

Sincerely,

Michael Drobac
Executive Director
Small UAV Coalition

Brian Wynne
President and CEO
AUVSI

Andrew Charlton
Executive Director
European Small UAV Coalition

Ali Bahrami
Vice President, Civil Aviation
Aerospace Industries Association

Doug Davis
Co Chair, CANSO
Collaborative Airspace Working Group

cc: Christopher Swider