

From: UAShelp@faa.gov
To: frank [REDACTED]

Subject: RE: Question - PL112-95 S336

Date: Jul 12, 2016 9:48 AM

Dear Mr. M [REDACTED],

The FAA does not interpret PL 112-95 Section 336 (a) (2) as requiring membership in a CBO, nor does the FAA list any CBOs. You must only follow the guidelines of a CBO.

Regards,
FAA UAS Integration Office
UAShelp@faa.gov
<http://www.faa.gov/uas>

-----Original Message-----

From: Frank [REDACTED] [mailto:frank [REDACTED]]
Sent: Sunday, July 10, 2016 10:33 AM
To: 9-NATL-UAS-Help (FAA)
Subject: Question - PL112-95 S336

Hello,

Public law 112-95 section 336 paragraph (a)(1) through (a)(5) details five conditions that must be met for a sUAS / sUAS operation to be considered a "model aircraft" under the law. Paragraph (a)(2) discusses a community-based organization and uses the word "and" on two conditions within that sentence. In the FAA's "Interpretation of the Special Rule for Model Aircraft" the question of a membership requirement was left unanswered.

It is an important question as to whether the FAA will require citizens to be members in private dues collecting organizations in order to enjoy the privilege of operating a "model aircraft" in the public airspace. Requiring membership in the AMA to operate as a "model aircraft" as defined in PL112-95 Section 336(a)(2) would be the legal equivalent of requiring membership in AOPA to operate as a private pilot. Therefore, this is an important ambiguity to be resolved.

Therefore, Yes or no, does the FAA interpret PL112-95 Section 336 paragraph (a)(2), "the aircraft is operated in accordance with a community-based set of safety guidelines and within the programming of a nationwide community-based organization;" to mean that to be considered a "model aircraft" under the law, the operator must be a member of a community-based organization?

Thank you.

Sincerely,
Frank [REDACTED]
[REDACTED]