



## Promoting Drone Security

The safety, security, efficiency, sustainability and equity benefits of commercial uncrewed aircraft systems (UAS or drones) are significant, and drones are already enhancing lives in communities around the world. The Commercial Drone Alliance (CDA) understands that all technology can be used for good and for bad. We therefore appreciate the common interest that the government, industry, and the general public all share in protecting against potential public safety and homeland security threats posed by rogue or unauthorized UAS. Indeed, the CDA considers innovation and security two sides of the same coin.

The CDA has worked for years with federal government officials, industry stakeholders and others to promote solutions that enable the safe and secure integration of UAS into our National Airspace System. The CDA was honored to participate in, and help lead a working group of, the FAA's recent UAS Detection and Mitigation Aviation Rulemaking Committee (CUAS ARC).

As the CUAS ARC recognized, drone security policy has lagged behind the pace of technology. This legislative stagnation has impacted the health of the domestic drone security industry, while risking safety and security. Congress must update archaic laws that inhibit the ability of federal, state, local and private entities to protect sensitive airspace.

In that spirit, the CDA supports:

- **Expanding Advanced Detection Capabilities.** The CDA supports the view of the UAS Detection and Mitigation Aviation Rulemaking Committee (CUAS ARC) that it is important to have direct, low-cost access to accurate information regarding low-altitude aviation within the vicinity of sensitive or highly vulnerable ground sites, including critical infrastructure, mass gatherings, active public safety, and emergency response incident scenes, as well as other locations that may require enhanced protection. With the recent implementation of the FAA's Remote Identification rule, and with the vast majority of UAS required to broadcast their location, enabling broad use of detection technology makes sense.
- **Pilot Program.** The CDA supports the recommendation of the CUAS ARC to more broadly enable the testing of detection and mitigation technologies in real-world environments. To that end, the CDA supports a Pilot Program immediately enabling certain state, local, tribal or territorial law enforcement agencies to utilize approved detection and mitigation technologies, with the option if successful for the federal government to increase the Pilot Program before the law's sunset. The CDA supports a compromise between the House and Senate legislation in terms of size of the Pilot Program. The CDA understands the desire of some stakeholders to limit covered

sites to stadiums with a TFR, large public gatherings as defined in the FAA Reauthorization Act of 2024, and “fixed site facilities” as designated in a Section 2209 rulemaking. Limiting the program to areas with a flight restriction makes sense, as legitimate operators already know to avoid operating in those areas. However, it is important that the program move forward immediately, and not wait for rulemakings to take place, which may take years. In addition, the federal government should be specific at the front end to define what a successful program will look like by providing clear metrics to measure success.

- **Streamline Interagency Approval Processes.** The CDA supports a requirement for FAA and other federal agencies to approve advanced detection and mitigation technologies before use, as well as training requirements. However, the CDA urges policymakers to streamline processes by publishing timelines and utilizing other accountability mechanisms to ensure progress.
- **Extend Appropriate Authority to Other Federal Agencies.** The CDA also supports expanding Counter-UAS authority to certain federal agencies, including the Department of State, National Aeronautics and Space Administration, and the Transportation Security Administration.
- **Establish Verified Operator System.** The CDA believes that any CUAS legislation must not interfere with lawful commercial UAS operations. As recommended by the CUAS ARC, the CDA supports incorporation of a “verified operator” system for drones similar to the Transportation Security Administration’s Pre-Check and Global Entry programs. Such a framework would enable the government to maintain a database of authorized commercial UAS operations and help the relevant agencies and public safety officials with threat assessment and threat discrimination.
- **Future Certainty for Government and Industry.** The CDA believes that any comprehensive CUAS legislation must include a multi-year extension and enhancement of CUAS authorities to allow federal agencies, as well as state, local, tribal and territorial (SLTT) governments to appropriately plan and budget their CUAS activities. Additionally, this certainty will allow for industry stakeholders to invest in the future, which will foster innovation and competitiveness currently lacking in the marketplace.

The CDA appreciates the opportunity to work with Congress and the Administration on these important issues, and we look forward to continued collaboration.