



February 28, 2025

Russell Vought
Director, Office of Management and Budget
725 17th Street, NW
Washington, D.C. 20503

Re: Expediting Deregulation of Commercial Drone Operations to Unleash Prosperity

Dear Mr. Vought:

The Commercial Drone Alliance (CDA)¹ appreciates the Trump Administration's focus on "reducing unnecessary, burdensome, and costly Federal regulations," because "[o]verregulation stops American entrepreneurship, crushes small business, reduces consumer choice, discourages innovation, and infringes on the liberties of American citizens."² Deregulation is important for the growth of the commercial drone industry in the United States.

The Federal Aviation Administration's (FAA's) draft rule to deregulate commercial unmanned aircraft systems (UAS, or drone) operations beyond visual line of sight (BVLOS) is essential to enable this industry to succeed in the United States. The BVLOS rule (RIN 2120-AL82) is expected to remove regulatory impediments to innovation and unlock the potential of large-scale commercial drone operations for the American people while boosting our domestic industrial base and improving airspace transparency nationwide. The purpose of the BVLOS rule is to enable and normalize commercial drone operations that are otherwise prohibited or require individual approval through bureaucratic and time-consuming FAA application processes. We urge the Trump Administration to expedite this industry-supported rulemaking as a deregulatory action that reduces administrative burden, bolsters economic growth, and supports national security under Executive Order (EO) 14192, *Unleashing Prosperity Through Deregulation*. Quick action is possible because the FAA has already done substantial work to prepare the draft rule and interagency stakeholders have already provided input.

Background

As we all know, policy development routinely lags behind the pace of innovation in America. As a result, deployment of drone technology has been trapped in a regulatory quagmire, which threatens American competitiveness with foreign nations. This is due to antiquated aviation regulations that are ill-equipped to integrate this new type of aircraft and keep pace with technological innovation. The resulting restrictions are primarily bureaucratic and do not enhance safety. For example, farmers using crop-spraying drones with no

¹ The CDA is an independent non-profit organization led by key leaders in the commercial drone industry. The CDA has actively participated in rulemakings and policy efforts to facilitate the safe and secure development and expansion of commercial drone operations. The CDA works with all levels of government to collaborate on policies for industry growth and seeks to educate the public on the safe and responsible use of commercial drones to achieve economic benefits and humanitarian gains. We bring together commercial drone end-users, manufacturers, service providers, advanced air mobility companies, drone security companies, and vertical markets including oil and gas, precision agriculture, construction, security, communications technology, infrastructure, newsgathering, filmmaking, and more. Learn more at <https://www.commercialdronealliance.org/>.

² Presidential Fact Sheet, *President Donald J. Trump Launches Massive 10-to-1 Deregulation Initiative* (Jan 31, 2025), <https://www.whitehouse.gov/fact-sheets/2025/01/fact-sheet-president-donald-j-trump-launches-massive-10-to-1-deregulation-initiative/>.

onboard pilot must apply for special relief from the FAA due to requirement for pilots to use a seat belt when flying aircraft—obviously an artifact of regulations meant for manned aviation. Current regulations severely limit drones to flying almost exclusively within line of sight, meaning that drone operators must follow every drone flight with a human on the ground watching the aircraft at all times. Regulatory morass like this has cost our nation its global leadership role in the next generation of aviation and automation, where our competitors include the People’s Republic of China.

In his first term, President Trump laid important groundwork for deploying drone technologies with the highly successful UAS Integration Pilot Program, which improved the use of these critical technologies in communities across the country. This program advanced America First policies, created American jobs, strengthened public-private partnerships in the aviation industry, proved the industry is ready to commercialize, and promoted American innovation. In 2020, the Trump Administration finalized the most recent enabling regulation for the commercial drone industry, allowing routine drone operations over people and at night, and instituted a digital drone license plate requirement (commonly called remote identification) to enhance transparency in the sky. It is now time for the next step forward in creating a regulatory framework that removes barriers to scaling the use of commercial drones for the benefit of our nation.

Based on industry recommendations, the FAA drafted a BVLOS rule intended to safely enable the American drone industry to succeed while enhancing transparency in the airspace. Congress, with bipartisan support, required publication of this draft rule by September 2024³, but the previous Administration did not accomplish what Congress directed. This delay comes at the expense of U.S. competitiveness, as industry continues to be held back by convoluted bureaucratic processes that constrain safety enhancing technologies.⁴ The House Committee on Transportation and Infrastructure and the Government Accountability Office have both criticized the FAA’s lack of progress in streamlining drone regulation, describing the stagnation as “concerning”⁵ and highlighting how the FAA still lacks a comprehensive strategy to integrate drones into the National Airspace System more than a decade after Congress mandated the FAA to develop one.⁶

BVLOS: Deregulating Beneficial Drone Use for American Competitiveness

The time is ripe for President Trump to build on the successes of his first term and remove the bureaucratic red tape inhibiting drone technology in America. The BVLOS rule will unleash growth by enabling drones to operate under a right-sized regulatory framework rather than relying on exemptions and waivers from existing regulations designed for legacy aircraft. Time is of the essence. Publishing this draft rule is key to providing the regulatory certainty needed to accelerate the adoption of drones across multiple industries and strengthen domestic drone manufacturers’ ability to scale and compete globally.

In addition to being deregulatory, the BVLOS rule will also enhance national security and place minimal costs or burdens on the private sector – both of which EO 14192 recognizes as special considerations.⁷ We

³ P.L. 118-63, Section 930.

⁴ See *id.* at 20–26 (noting that interviewed UAS industry stakeholders felt the FAA had not clearly communicated how to obtain approval for advanced UAS operations, how the FAA internally reviewed operational requests, and that the agency lacked a standardized approval process across its multiple offices).

⁵ Letter from Chair of House Committee on Transportation and Infrastructure Sam Graves (R-MO), Ranking Member Rick Larsen (D-WA), and other members of the Committee to Secretary of Transportation Pete Buttigieg and FAA Administrator Michael Whitaker, Oct. 21, 2024 (noting concern that a “failure to comply with statutory instructions may result in the delay of a final [BVLOS] rule” and stating that “[t]he DOT and the FAA must work in a safe and expeditious manner to issue this critical rulemaking.”) (found at https://transportation.house.gov/uploadedfiles/2024-10-21_-_bvlos_letter_to_dot_faa.pdf).

⁶ See U.S. Gov’t Accountability Off., GAO 23-105189, *FAA Should Improve Its Approach to Integrating Drones into the National Airspace System* 14–15 (2023), <https://www.gao.gov/products/gao-23-105189> (noting the FAA’s UAS planning documents include only portions of four of the seven required elements for a comprehensive strategy).

expect the BVLOS rule to enhance national security interests by increasing transparency in our airspace and by creating a normalized rule set against which we can more effectively detect rogue and malicious aircraft. Moreover, we expect the rule to decrease costs to industry significantly compared to the status quo. We would be happy to work with the Administration to help quantify the substantial benefits associated with this deregulatory action.

Conclusion

Thank you for considering this request to advance the BVLOS rule. We greatly appreciate your support for deregulation to unleash economic growth in the commercial UAS industry, boost our domestic industrial base, and support national security. Please call on us if we can be helpful in moving this effort forward promptly.

Sincerely,

A handwritten signature in blue ink that reads "Lisa Ellman". The signature is fluid and cursive, with a long horizontal stroke at the end.

Lisa Ellman
Executive Director
Commercial Drone Alliance

cc:

Susie Wiles
Assistant to the President and Chief of Staff

Stephen Miller
Assistant to the President and Deputy Chief of Staff for Policy

Michael Waltz
White House National Security Advisor

Sean Duffy
United States Secretary of Transportation

Chris Rocheleau
Acting FAA Administrator