



Federal Aviation Administration
Office of Rulemaking
Room 810
800 Independence Avenue, SW
Washington, DC 20591

24 January 2023

Re: Exemption Request to 14 CFR 89.105 Remote Identification Requirement

To whom it may concern:

COLSA Corporation has an active contract for the production of sUAS for United States Army. These sUAS are purpose-built to be used by our government customers for testing and training events. Once delivered to the customer, these sUAS are primarily operated within restricted airspace at US Army Test Ranges and Combat Training Centers.

During the test and tuning portions of our Rapid Design Test and Evaluation (RDT&E) process at our home station in Huntsville, AL, we must test fly each aircraft before releasing them to the customer. This necessitates the ability to fly them in the National Air Space (NAS) and consequently we must comply with FAA regulations concerning operating sUAS with remote identification. We request an exemption to 14 CFR 89.105 based on the following information:

We currently have a full complement of over 15 UAS remote pilots with thousands of combined hours of flight experience as Part 61 and Part 107 pilots. We have processes and procedures in place for safe and reliable operation of each sUAS we are testing and always abide by the laws of our state and local government and all FAA regulations regarding UAS operations. COLSA remote pilots have logged over 1700 hours of incident free operations to date.

Our test flight operations are currently limited to two locations. The first location is at our main production facility. This facility falls within the Class D boundaries of Redstone Army Airfield (KHUA) and requires us to hold a FAA airspace waiver and notify KHUA before each flight. This notification must be via telephone 15 minutes prior to flight. Once the flight is complete, we are required to notify KHUA that we are complete. If any emergency situation arises during our flight, we have reporting procedures to inform KHUA, which are mandated by the waiver. In addition to the daily notification before any flights, KHUA also periodically submits a NOTAM for our intended operations.

The second location is a local FAA Recognized Identification Area (FRIA) which does not require the use of remote identification. However, for a majority of our test flights at the FRIA, we must submit a NOTAM due to our FAA operational waiver requirement.

Both areas that we operate are known flight operation locations, and the notification process meets or exceeds the remote identification rules intent. Because of this, we believe this exemption request would not adversely affect safety.



We would request an exemption to 14 CFR 89.105 which would grant us the ability to operate our sUAS without remote broadcast modules. These sUAS are not required to be produced with standard remote identification since they are not produced for commercial purposes. This has been verified and documented through contact with the FAA. However, unless we are granted an exemption, our operators would still be obligated to comply with the requirement to utilize remote identification broadcast modules when the September 2023 deadline arrives. Since COLSA is producing these sUAS for the US Army customer without standard remote identification, purchasing and maintaining remote identification broadcast modules would be an extra expense that is not necessary.

In summary, COLSA Corporation is requesting an exemption to 14 CFR 89.105, to allow our sUAS manufactured for DOD customers to be test flown in the NAS without remote identification broadcast modules. Our operations take place in known flight areas that already require notification of the authorities which mitigates the need for and meets the intent of remote identification.

If you have any questions concerning this request, please contact Christopher J Cline, ccline@colsa.com, (912) 656-3639 on behalf of the TStorm Program Manager, Brian Wohlschlaeger.

Christopher J. Cline
Chief Pilot