

# Client Alert

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## FAA Fast-Tracks Flights for UAS Test Sites

Last week, the Federal Aviation Administration (FAA) significantly streamlined the process for the six authorized unmanned aircraft systems (UAS) test sites to get most flights in the air. The test sites were issued “blanket” [Certificates of Waiver or Authorization \(COAs\)](#) that allow them to operate small UAS throughout the National Airspace System at or below 200 feet above ground level, subject to minimal restrictions. The issuance of these broadly permissive blanket COAs has several important effects.

Prior to the issuance of these blanket COAs, the test sites were required to apply for and obtain separate COAs from the local Air Traffic Organization for each distinct set of flight operations. This would include the operation of different UAS craft in a designated area or the operation of the same craft in different geographic locations. The process of obtaining a COA, which typically ran close to 60 business days, now is unnecessary for the vast majority of UAS flights conducted by the test sites.

These blanket COAs also permit the UAS flights to be conducted by test site operators holding a recreational or sport pilot license and a valid driver’s license. Previously, the operator was required to hold at least a private pilot license and a third class medical certificate. Consequently, the field of potential operators that can be employed by the test sites has grown dramatically.

These expedited procedures and expanded parameters closely resemble [those recently afforded to civil UAS operations conducted under a Section 333 exemption](#). Flights conducted by the test centers, however, are “public aircraft operations” that do not require a Section 333 exemption. Now that the test sites are back on the same footing (with respect to COAs) as civil operations pursuant to a Section 333 exemption, the test sites appear to provide the most expeditious means, from a regulatory standpoint, of pursuing UAS test flights.

Last week’s announcement comes on the heels of several other concrete steps taken by the FAA in recent months to accelerate the integration of UAS into the National Airspace System. An overview of those developments will be available in our forthcoming *Spring 2015 UAS Review*.

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