

Docket No. 26-189

Dear FCC,

I am writing to oppose the Federal Communications Commission (FCC)'s Notice of Proposed Rulemaking as currently written. While I broadly support the Commission's goal of protecting our national security and addressing legitimate risks associated with foreign-produced UAS, the current proposal will inadvertently harm safe, traditional model aviation.

Specifically, I strongly urge the Commission to remove or revise the proposed definition that classifies any UAS weighing 55 pounds or more as "military-grade." Weight alone is not an adequate indicator of military capability. For decades, recreational hobbyists have safely built and flown large-scale model aircraft weighing more than 55 pounds under established community safety guidelines recognized by the Federal Aviation Administration (FAA).

These traditional model aircraft are fundamentally different from military UAS. They are operated strictly within Visual Line of Sight (VLOS) and lack advanced autonomous capabilities such as pre-programmed waypoint navigation or cellular internet connectivity. Treating these conventional recreational aircraft as 'military-grade' overlooks their simple mechanical design and complete absence of defense-oriented capabilities.

A weight-based definition could therefore sweep ordinary recreational model aircraft into a prohibition that is intended to address substantially different national security concerns. The Commission should consider whether a UAS actually possesses military-relevant capabilities, rather than relying on weight alone as a proxy for those capabilities.

I also encourage the Commission to carefully consider the scope of its definitions for UAS critical components and docking stations so that ordinary equipment used by recreational modelers is not unnecessarily affected.

Please ensure that any final rule clearly distinguishes genuine national security threats from safe, established recreational model aviation.

Thank you for considering my comments.

Sincerely,

**[Name]**

**[City, State]**

**[Optional: AMA Number / Local Club Name]**