

Docket No. 26-189

Dear FCC,

I am writing to oppose the Federal Communications Commission (FCC)'s Notice of Proposed Rulemaking as currently written. As a representative of a small business serving the model aviation community, I support the Commission's goal of protecting our national security and addressing legitimate risks associated with foreign-produced UAS; however, I am concerned that the proposed restrictions would place unnecessary burdens on small American businesses that sell safe, recreational model aircraft and their components.

Our industry depends on being able to reliably obtain and sell aircraft, batteries, motors, radio equipment, flight controllers, and other components used by hobbyists. Much of this equipment is produced overseas, and suitable domestic alternatives are either not readily available or, where they do exist, might be priced beyond what the recreational market is generally willing or able to pay. Restricting the importation and marketing of products based on broad definitions could therefore reduce product availability, increase costs, and make it more difficult for small retailers to serve their customers.

I am particularly concerned about 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. Recreational modelers 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.

Beyond finished aircraft, I am concerned that these proposed restrictions will cause widespread disruptions across the US commercial UAS supply chain. Retailers rely on predictable supply chains for aircraft, replacement parts, and components. Broad or ambiguous definitions risk restricting commercially available equipment, making it nearly impossible to maintain inventory or support customers. This threat is especially urgent for existing inventory and supply commitments; retailers might have already purchased products, placed orders, or committed significant capital based on current import rules. Unclear restrictions risk stranding that capital, limiting competition, and driving up costs for businesses and consumers alike.

I urge the Commission to carefully evaluate these downstream economic effects on small businesses, retailers, and consumers. Any final rule must clearly distinguish genuine national security threats from ordinary commercial and recreational products. To avoid unnecessarily harming American small businesses, any restrictions should be narrowly tailored, provide reasonable flexibility or exemptions, and include adequate transition time for existing supply chains and inventory to adjust.

Thank you for considering my comments.

Sincerely,

[Name]

[Business Name]

[City, State]