

Docket No. 26-189

Dear FCC,

I am writing to oppose the Federal Communications Commission's (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 and the educational opportunities that it provides.

I am an educator who uses model aviation as a hands-on tool for teaching students about science, technology, engineering, mathematics, and aviation. Model aircraft give students an opportunity to apply concepts such as aerodynamics, electronics, flight controls, construction, and problem-solving in a practical setting. Educators also encourage students who are interested in aviation to seek out opportunities to fly, visit model aviation fields, and learn from experienced hobbyists. Larger recreational model aircraft can be particularly valuable in these settings by demonstrating the possibilities of aviation and sparking students' interest in the hobby and related careers.

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. 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.

A weight-based definition could therefore make it more difficult to maintain access to certain model aircraft and the opportunities that they provide. Additionally, I am concerned that the broad language surrounding batteries and docking stations could make it significantly more difficult to obtain the necessary components for educational purposes.

I urge the Commission to carefully consider whether these models, when they are used in educational model aviation, present the national security concerns that this proposal is intended to address. It should also consider the practical supply chain and educational consequences of limiting access to these components, particularly where affordable domestic alternatives might not be readily available.

Please ensure that any final rule clearly distinguishes genuine national security threats from safe, established model aviation and the educational opportunities that it provides.

Thank you for considering my comments.

Sincerely,

[Name]

[City, State]

[School/Organization, if applicable]

[Optional: AMA Number / Local Club Name]