

Public comments — FCC 26-50 / ET Docket No. 21-232

Dear FCC,

I am writing to express my concern about portions of the Federal Communications Commission's (FCC's) proposal in ET Docket No. 21-232, *Protecting Against National Security Threats to the Communications Supply Chain Through the Equipment Authorization Program*.

I support the FCC's efforts to address legitimate national security threats. However, the Commission must ensure that rules that are intended to address sophisticated, unmanned aircraft systems (UAS) do not unintentionally sweep in traditional recreational model aviation.

Traditional model aircraft are fundamentally different from advanced UAS that might present national security concerns. Model aircraft are generally manually controlled by a human pilot, operated within visual line of sight, and used for recreation, education, training, competition, and experimentation. They generally do not have the autonomous flight, long-range communications, cellular or satellite connectivity, cloud-based operation, persistent surveillance, or independent mission capabilities that are associated with more sophisticated UAS.

I urge the commission to recognize that advanced-capability UAS and traditional model aircraft represent distinct areas of aviation and should be regulated accordingly. This distinction should not be interpreted as opposition to UAS or FPV technology. I support the safe recreational, educational, and innovative use of UAS and FPV systems and recognize their value in introducing people to aviation and developing new skills.

At the same time, traditional model aircraft should not be subjected to regulations intended for UAS with substantially different capabilities, functions, or risk profiles. Maintaining a clear distinction between these categories will allow appropriate requirements to be developed for emerging UAS technologies while preserving the longstanding recreational, educational, and competitive model aviation activities that have been safely conducted for decades.

The FCC should therefore regulate based on actual capability, intended use, and demonstrated risk, rather than simply whether a piece of equipment can be used on an aircraft.

I am particularly concerned that ordinary components that are commonly used in model aviation—including batteries, motors, electronic speed controllers, servos, transmitters, receivers, radio modules, and other generic electronic components—could inadvertently

be treated as UAS-specific or critical components simply because they can be used on an unmanned aircraft. These components have broad applications and are not inherently indicative of an advanced UAS or a national security threat.

I respectfully ask the Commission to:

1. Clearly distinguish traditional recreational model aviation from advanced UAS based on capability, intended use, and risk.
2. Ensure that generic model aviation components are not subject to UAS-specific restrictions merely because they can be used on an aircraft.
3. Avoid imposing requirements on low-risk, recreational equipment that are intended to address substantially different national security threats.
4. Establish clear protections or a safe harbor for traditional recreational model aviation equipment that does not possess advanced autonomous or networked UAS capabilities.

The FCC can address genuine national security concerns without unnecessarily disrupting safe, established, recreational model aviation or the ordinary equipment that is used by its participants.

Thank you for considering my comments.

Sincerely,

[Name]

[City, State]

[Optional: AMA Number / Local Club Name]