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Douglas C. Taylor, Ph.D.  
Federal Aviation Administration  
National FOIA Staff (AFN-140)  
800 Independence Ave, SW  
Washington, DC 20591-0001

Re: Freedom of Information Act Request

Dear Mr. Taylor:

The Aeronautical Repair Station Association ("ARSA") respectfully submits this request for records and information from the Federal Aviation Administration ("FAA" or "the agency") pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. §§ 552, *et seq.*, and Department of Transportation ("DOT") regulations, 49 C.F.R. part 7. The records and information specifically referenced below are requested regardless of format, medium, or physical characteristics, and include all responsive electronic records and information.

The following public records are requested:

1. All Certificates of Waiver or Authorization ("COA"), and any attachments thereto, issued between April 30, 2014 and July 31, 2014 by the Air Traffic Organization, or any other subdivision of the FAA, to any public entity for the operation of an Unmanned Aircraft System ("UAS").

**Note:**

- The only records requested are the COAs (regardless of whether issued on FAA Form 7711-1 or in another manner) and the attachments specifically incorporated by reference therein.
- No supporting filings, documents, applications, or other documents are requested.

Mr. Douglas C. Taylor, Ph.D.

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### **Fee Waiver Request**

In accordance with 5 U.S.C. § 552(a)(4)(A)(iii) and 49 C.F.R. § 7.43(c), ARSA requests a waiver of fees associated with processing this records request. The requested documents concern the operations of the federal government and the FAA's oversight of unmanned aircraft systems. Disclosure of the requested material would significantly contribute to the general public's understanding of the regulatory requirements and restrictions for UAS operations in the United States. Moreover, this request is made primarily for non-commercial purposes. 5 U.S.C. § 552(a)(4)(A)(iii).

Specifically, the requested records will significantly contribute to greater public awareness and understanding of the FAA's *current* operational requirements for unmanned aircraft systems, and the extent to which the agency has waived various regulatory requirements. The tremendous public interest in this issue has already caused the agency to release some of the COAs; however, these documents pertain to COAs that were released a number of years ago and vary greatly depending on the agency to which they were issued. Disclosure of the requested documents will provide the public with the best understanding of how the agency is handling the most recent technological innovations in unmanned aircraft systems.

ARSA is a non-profit corporation, organized under section 501(c)(6) of the Internal Revenue Code. We are dedicated to enhancing aviation safety and assisting aviation regulators in developing guidance, policy, and regulatory interpretations that are clear, concise, and applied uniformly to all similarly situated individuals. ARSA vigorously pursues its mission by thoroughly analyzing aviation issues, informing the public of new developments, and participating in FAA rulemaking committees. The requested information is not in ARSA's financial interest and will enable ARSA to inform the public, via its website [www.arsa.org](http://www.arsa.org), as to the agency's *current* approach in waiving regulatory requirements for the operation of unmanned aircraft systems.

Accordingly, ARSA is entitled to a waiver of fees associated with processing this request.

### **Conclusion**

ARSA looks forward to working with the FAA in this matter. Please do not hesitate to contact our offices should you have any questions or concerns.

Best regards,



Marshall S. Filler  
Managing Director & General Counsel