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To:

Federal Aviation Administration
Docket No. FAA-2025-1908; Notice No. 25-07
Submit comments online

Subject: Public Comment on FAA Part 108 BVLOS UAS Proposed Rule

Dear FAA Rulemaking Team,

I am a general aviation pilot and am writing in support of incorporating **portable Electronic Conspicuity (EC) devices** as an approved option in the proposed Part 108 BVLOS UAS rule.

Low-altitude airspace below 400 ft AGL is increasingly busy with manned aircraft (Part 103 Ultralights, Gliders, Powered Parachutes, Lighter than Air balloons, and Ag Applicators) and growing drone operations. To ensure **manned aircraft remain visible to BVLOS drones and maintain right-of-way**, GA pilots need a practical, affordable way to broadcast their position.

Portable EC transmitters—offer that solution:

- **Affordable & Accessible:** Expected cost under \$1,000, with no avionics-shop installation or downtime, would ensure maximum adoption. Reference uAvionix skyEcho2 EC being used internationally.
- **Portable & Voluntary:** Battery/USB powered, window-mounted, and can be used only when needed.
- **Privacy Protected:** Uses anonymous UAT 978 MHz broadcast IDs, safeguarding aircraft registration data, and ensures widespread GA adoption. Removes the risk of landing fee use.
- **Proven & Effective:** Already in wide use overseas, and provides a reliable “see and be seen” capability so drones can automatically detect and avoid manned aircraft.

I strongly urge the FAA to **finalize Part 108 with explicit approval of portable EC devices as a cost-effective alternative to ADS-B Out** regarding UAS BVLOS operations below 400' AGL. This will greatly enhance GA safety by providing gliders, balloons, ultralights, and powered parachutes with the visibility benefits of EC. I would also preserve GA pilot autonomy and privacy, and help prevent mid-air conflicts as drone traffic grows.

Thank you for considering these comments and for supporting solutions that keep our shared airspace safe.

Sincerely,

[Signature]

Printed Name: _____