



April 24, 2015

Docket Operations
M-30
U.S. Department of Transportation
1200 New Jersey Avenue, SE, Room W12-140
West Building Ground Floor
Washington, DC 20590

Docket No. FAA-2015-0150

To Whom It May Concern:

On behalf of the nearly 22,000 members of the largest professional organization of real property appraisers, thank you for the opportunity to comment on the Federal Aviation Administration's ("FAA") proposal to adopt rules to allow the operation of small unmanned aircraft systems ("UAS") in the National Airspace System.

The Appraisal Institute views the increased use of UAS across many industries, including real estate, as an exciting development, if handled responsibly. Many valuation professionals see a considerable range of commercial uses for aerial drone technology, including marketing appraisal services, managing difficult-to-reach points on a structure or property and making remote structural measurements. We were pleased to see, in January of this year, that the FAA granted an exemption to a real estate company to use UAS, so they could provide aerial listings to their clients. Similarly, our organization sees the operation of UAS as a great opportunity for appraisers to provide an even more comprehensive valuation report to their clients. Because appraisers depend on information and data to develop an opinion of value, the prospective UAS would be of great assistance in many facets of appraisal, including litigation, where more pictures of a property would be helpful.

With that in mind, the Appraisal Institute is offering to assist the FAA in developing Policy and Procedure manuals for aerial site inspections of residential, commercial and industrial real estate. As you know, the Appraisal Institute is the leader in real property appraiser education, offering an extensive curriculum of introductory and advanced courses, as well as a wide range of seminars on specialty topics. These programs are designed to address the needs of all real estate appraisers, ranging from those just entering the profession to seasoned practitioners who wish to keep abreast of the latest techniques and developments.

Related to the proposal, the Appraisal Institute suggests that the FAA reconsider the 500-foot height ceiling for UAS found in this proposal, and establish a 400-foot height ceiling instead. As it stands now, radio controlled modeling clubs utilize 400 feet as a maximum height for unmanned aircraft, while manned aircraft may fly as low as 500 feet. We believe that a 400-foot ceiling would provide a 100-foot safety buffer between manned and unmanned aircraft and help ensure responsible use of UAS.

Thank you for the opportunity to provide comment on this proposed rule. Please contact Bill Garber, Director of Government and External Relations, at 202-298-5586, or bgarber@appraisalinstitute.org, if you have any questions.

Sincerely,

Appraisal Institute