

# PART 108 [BVLOS]:

## Boilerplate Comments for Security Companies (Copy-Paste + How to File)

**Use these three short comments as separate submissions or combine them.  
Add one line about your sites (warehouses, substations, stadium districts, ports) and company.**

### Comment A – Contained private-property operations (lowest risk + brief investigatory control)

**Subject:** Treat contained private-property operations as lowest risk; allow short, bounded investigatory control; do not apply uncontained-operation requirements.

- Treat low-altitude flights on private property with owner permission as the lowest-risk category. Keep aircraft at or below 50 ft AGL or within 50 ft of structures, exclude the public, and use geofencing. Allow a brief, autopilot-bounded investigatory control mode (geofenced; speed/altitude-limited; obstacle-avoidance on; one-button PAUSE/RTL; logged; training/recency). Remove population-density triggers, strategic deconfliction/conformance monitoring, and non-cooperative DAA for these contained missions; continue per-site approvals, RID status, and lost-link planning.

### Comment B – Shielded operations: include buildings/walls; no added DAA inside shielded areas

**Subject:** Keep shielded operations; add buildings/facility perimeters; keep no added DAA in shielded corridors.

- Preserve shielded operations and add buildings and exterior facility walls/fences to the 50-ft shielded list (or provide a simple designation path). Shielded corridors sit where crewed aircraft are not expected; right-of-way is already recognized. Do not add new detect-and-avoid hardware requirements inside shielded areas of contained operations.

### Comment C – Keep Part 108 focused on flight safety; remove country-of-origin gating

**Subject:** Remove country-of-manufacture as an eligibility gate; leave equipment security to the agencies that already oversee it.

- Airworthiness acceptance should be based on performance (Declaration of Compliance, accepted Means of Compliance, configuration control, inspections/audits), not where a UAS or its components are made. Federal agencies outside FAA already govern equipment security; duplicating those issues in Part 108 adds cost without aviation-safety benefit.

# PART 108 (BVLOS):

Make it Yours

## One-line personalization ideas (pick one):

- “We operate, or plan to operate, drones at sites across several locations with no public present in the operating area.”
- “Our patrol routes remain within 50 ft of buildings/walls and at or below 50 ft AGL.”
- “A bounded reposition reduces time aloft and speeds coordination with responders.”

## How to post a comment on Regulations.gov (first-timers):

1. Prepare your text (2–4 short paragraphs). Add one unique fact about your operations.
2. Open your browser to **Regulations.gov** and search for “**FAA-2025-1908**”. Open the Part 108 docket page.
3. Click the Comment button.
4. Paste your text (or upload a simple PDF on letterhead). Do not include sensitive or personal information—comments are public.
5. Submit. Save the Comment Tracking Number on the confirmation page.
6. Share the docket number with peers and ask them to file a short comment before the posted deadline.

## Terms in plain language:

1. BVLOS = beyond visual line of sight
2. Shielded = within 50 ft of listed infrastructure; request to add buildings/walls
3. Contained = low-altitude flights on fenced private property with owner permission
4. DAA = detect and avoid (non-cooperative aircraft detection)
5. RID = Remote ID
6. ROC = Remote Operations Center