

To whom it may concern,

In the last few months, we have been hearing a lot of chatter around Remote ID, as I'm sure you have too. The chatter has amplified in the last few weeks with the approaching September 16 deadline.

At Pilot Institute, we consider ourselves a neutral industry observer, an advocate for pilots and a liaison between the FAA and the flying community, whether crewed or uncrewed. Earlier this week, we sent a poll out to our customers and asked our industry connections and community groups to help share the survey.

As an FAA Industry Partner, FAASafety Course Author, FAA FAASTeam Member, and DronePro, I would like to share the results of the data we collected, hoping you will consider delaying the enforcement of Remote ID.

We collected 2,081 survey responses from Recreational Flyers, Part 107 Remote Pilots, and Public Safety professionals. 53% of those surveyed reported conducting operations under 49 USC 44809, 66% under 14 CFR Part 107, and 11% under a Public Safety Certificate of Authorization (COA). Respondents were able to select more than one option. **Based on the sample size, there is a 99% chance that real values can be extrapolated from our data within ±2.83% of the measured/surveyed value.**

Of those 2,081 survey responses, 49% said they had at least one drone already equipped with Standard Remote ID, 51% said they needed at least one Remote ID module, 10% said they were exempt from Remote ID by flying a sub-0.55 lbs drone under the recreational exemption, and 5% said they would solely operate at an FAA Recognized Identification Area (FRIA).

The reasons for my request to delay Remote ID enforcement are as follows and illustrated with graphs at the end of this letter:

- Of the 51% who reported needing a Remote ID module, **half (53%) said they would be forced into non-compliance**. That's 27% of the entire flying population. There were three main reasons for this:
 - 23% reported that modules are currently backordered and not available from every manufacturer. We verified this claim to be true independently.
 - 11% ordered but did not receive their modules yet.
 - 19% said their drones will be compliant in early December via a firmware update, which was announced by DJI late last week.
- Of the 51% who reported needing a Remote ID module, **more than half (42%) said they have not ordered yet because the pricing is a concern.** That's 21% of the entire flying population.



- Between the two previous statistics, it is clear that **nearly half the flying population is currently not ready for Remote ID**. We are only two weeks away from the mandate.
- While 49% of the entire flying population is ready for remote ID, **27% are currently** being forced into non-compliance, due to no fault of their own.
- Survey participants reported that 15% of the flying population would voluntarily not comply with Remote ID requirements.
- According to the FAA website, only one FRIA is currently approved. As a result, 5% of the flying population will be grounded on September 16, 2023, unless more FRIAs are approved by then.

One of the most popular Remote ID module manufacturers, BlueMark Innovation, is reporting delivery capabilities of 150 modules per week. There are only 6 approved module manufacturers at the moment.

- According to faa.gov/uas, there are at least 540,000 recreational flyers (based on TRUST certificates issued). Our data showed that 45% of recreational flyers have at least one drone needing a module. 20% of Recreational Flyers reported they would voluntarily not comply with Remote ID requirements. This puts the number of modules needed for recreational flyers at around 194,000.
- According to faa.gov/uas, there are 331,000 certified Remote Pilots. Our data showed that 59% of Remote Pilots need at least one module. 12% of Remote Pilots reported they would voluntarily not comply with Remote ID requirements. This puts the number of modules needed for Remote Pilots at at least 171,000.
- Only 3% of our surveyed population who needed a module reported having received theirs and being compliant. Using an approximate total demand of 365,000 units, it's possible that only 11,000 units been delivered to date.
- With current supply chain issues worldwide, with only 6 approved module manufacturers and over 350,000 units needed, delaying enforcement until at least March 2024 would help manufacturers catch up with demand. That's still over 2,200 units per manufacturer per week over the next 26 weeks.

Tensions are high at the moment. I don't say this lightly. The pushback for Remote ID has been fierce since 2019, with over 55,000 comments on the Notice of Proposed Rule Making. The only chance of success for Remote ID is community buy-in. **Without widespread acceptance and compliance, Remote ID will fail and will be impossible to enforce.** As it stands, 43% of operators will be forced into non-compliance in 2 weeks, or simply refuse to comply. This number can decrease if pilots and operators are given more time to comply.

Last year, the FAA delayed the enforcement of Remote ID for drone manufacturers from September 16, 2022 to December 16, 2022. As an FAA Industry Partner with a clear pulse on the current situation, I humbly request that you delay Remote ID enforcement for drone operators from September 16, 2023 to March 2024 or later.



Please see the attached graphs for more clarity on the data provided.



Q1: Select all that apply regarding Remote ID



Participants could select more than one answer.







Q4: Which rules do you follow when flying your drone

Thank you in advance for your time and consideration,

Greg Revérdiau Co-Founder, Pilot Institute Remote Pilot, Commercial Pilot ASEL/AMEL, Instrument Rated Flight Instructor/Flight Instructor Instrument FAA FAASTeam Representative/DronePro FAA Industry Member/FAA Course Author

CC: Jeffrey Vincent - Executive Director FAA UAS Integration Office Lawrence Fields - Acting Executive Director, Flight Standards Service Patricia Mathes - Manager, National FAAST Team Kevin Morris - UAS and AAM Coordinator Joe Morra - Director, Safety and Integration Bradley Palmer - AFS800 Division Manager