



July 16, 2018

Ms. Anita Ramasastry, President
Uniform Law Commission
111 N. Wabash Avenue, Suite 1010
Chicago, Illinois 60602

Re: Clarification of Amazon's Position on Tort Law Relating to Drones Act

Dear Ms. Ramasastry,

On July 5, 2018, Amazon joined a coalition of companies and associations representing the unmanned aircraft industry in a letter opposing the current draft of the Uniform Law Commission (ULC) Tort Law Relating to Drones Act. We write separately to ask for removal of sections in the draft that mischaracterize Amazon's support for the proposal. Amazon does not support a line in the sky concept.

Amazon is cited in section 301 of the draft in a manner that suggests Amazon's support of an airspace restriction below 200 feet. On page 17, lines 14-21, the Committee states, in pertinent part:

Practical reasons for selecting this altitude include the fact that at least three states have adopted altitude limits higher than adopted in this Act, including one state (Nevada) where a leading drone package delivery company testified in support of legislation that featured a 250 foot altitude limitation. (*Testimony of John Griffin of Amazon Inc.*, <https://www.leg.statye.nv.us/Session/78th2015/Minutes/Senate/JUD/Final/1124.pdf>).

The cited testimony, which was provided by a consultant for Amazon, not an Amazon employee, was in support of state legislation that exempted commercial operations authorized by the FAA from the 250 feet limitation in the Nevada law. Because the ULC draft does not include a commercial exemption and thus does not reflect the context in which this testimony was given, we ask for this citation to be removed.

On page 16, lines 30-41, an Amazon whitepaper was incorrectly cited as support of an altitude threshold. The Comment states:

The altitude ceiling for this exclusion is low enough that unmanned aircraft will still have a right to transit above property and surface improvements. (See e.g., *Amazon Whitepaper: Revision the Airspace Model for the Safe Integration of Small Unmanned Aircraft Systems*, available through NASA at: [https://utm.arc.nasa.gov/docs/Amazon_Revising%20the%20Airspace%20Model%20for%20the%20Safe%20Integration%20of%UAS\[6\].pdf](https://utm.arc.nasa.gov/docs/Amazon_Revising%20the%20Airspace%20Model%20for%20the%20Safe%20Integration%20of%UAS[6].pdf); see also Forbes, "Amazon Proposes Drone Highway As It Readies For Flying Delivery" <https://www.forbes.com/sites/ryanmac/2015/07/28/amazon-proposes-drone-highway-as-it-readies-for0-flying-delivery/#6b230ce62fe8> (noting Amazon's proposal that "areas between 200 and 400 feet would be reserved for a sort of drone highway. UAVs in the 200-foot range would likely be traveling autonomously at high-speeds and out of the line-of-sight of any operator.").

The whitepaper referenced above was a thought piece positing the creation of an Unmanned Traffic Management (UTM) system that would promote safe operations *above and below 200 feet* based on operator capabilities and aircraft equipage, not calling for a property right line in the sky.

We ask that you please remove these two citations to avoid creating the misleading impression that Amazon endorses the ULC proposal. We look forward to continuing to work with you.

Sincerely,



Blair Anderson
Director, Public Policy

Cc: Paul M. Kurtz, Chair, Tort Law Relating to Drones Committee
Mark Glazer, Vice Chair, Tort Law Relating to Drones Committee