**Response to the FCC Report Number 3089**

Further References:

1. **RM-11798**
2. “Petition To Adopt Service Rules for Unmanned Aircraft Systems (“UAS”) Command and Control in the 5030-5091 MHz Band”

Response:

1. We, as the collective body of WG-2 under RTCA’s Special Committee SC-228, are pleased to support the above referenced petition for rulemaking.
2. We, as the collective body of WG-2 under RTCA’s Special Committee SC-228, are especially interested to remain primary stakeholders in Parts III and IV of the petition, i.e.:
3. “III. THE COMMISSION SHOULD RESTRICT THE USE OF THE UAS ALLOCATION IN THE 5030-5091 TO SAFETY-OF-LIFE COMMUNICATIONS”
4. “IV. THE COMMISSION SHOULD ESTABLISH A FREQUENCY ASSIGNMENT MANAGEMENT SYSTEM TO DYNAMICALLY ASSIGN OPERATING FREQUENCIES TO LICENSED PICS”
5. In support of footnote 16 of the petition, we would like to spread the message about the FAA regulatory material.
6. Technical Standard Order (TSO) C213, “Unmanned Aircraft Systems Control and Non-Payload Communications Terrestrial Link System Radios.”
7. The FAA has also prepared an Advisory Circular AC 20-187, “Airworthiness Approval of Unmanned Aircraft Systems Control and Non-Payload Communications Terrestrial Link Systems.” The AC is in legal review and will soon enter the public comment period.

Both documents recognize and continue the work done in RTCA SC-228 that culminated in the publication of RTCA’s DO-362, “Command and Control (C2) Data Link Minimum Operational Performance Standards (MOPS) (Terrestrial).”

1. We also attach a technical report, which is widely accepted by WG2 of RTCA’s SC-228, entitled “Frequency Assignment Function for UAS C2 Links.” This document helps expand on Appendix I of RTCA’s published standard DO-362.

Attachments:

1. Technical Standard Order (TSO) C213, “Unmanned Aircraft Systems Control and Non-Payload Communications Terrestrial Link System Radios”. This can also be downloaded from FAA website <http://rgl.faa.gov/>
2. MITRE’s technical report on “Frequency Assignment Function for UAS C2 Links”

Sincerely,

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