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From: Bob Violett  
To: AMA President Bob Brown  
CC: Dave Mathewson, Rich Hanson  
Re: Response to FAA Model Aircraft Rule Interpretation

Gentleman,

During the last few years, I have been concerned about the ramifications of FPV on our hobby. I have stated so in two letters to the AMA in October and December of 2012 that I believe the FPV will attract unnecessary attention to our hobby by various governmental agencies. It now appears that my observation was correct, but our AMA has actually been encouraging this activity.

I agree with the portion of the FAA ruling interpretation that describes a model aircraft operation to be "line of sight" only with no visual enhancement beyond normal corrective eyeglasses. They actually referred to our AMA Safety Code.

It cannot be denied that FPV operations contribute to the blurring of the line of distinction between a model airplane and a sUAS.\*

Instead of the AMA doing everything possible to maintain that distinction, you have adopted and embraced the FPV enthusiasts, falsely thinking that a few rules could contain this activity. The AMA's opinion that somehow documents #550 and #560 will suffice to control the FPV menace, is true fantasy. The AMA has shown multiple times in the past that it is unwilling to discipline any of its members for Safety Code Violations.

Anecdotal evidence that the line of distinction is blurred, is that many people (the public) refer to R/C Model Aircraft now as "Drones". I have heard these comments from spectators at multiple model aircraft events. At these events, I have also listened to FPV enthusiasts brag that they have flown their vehicles 2-5 miles away from their launch location. They could care less that their activities threaten our hobby.

In my opinion, the AMA will never reverse the FPV ban by the FAA. When a federal agency is charged with "public safety", their easiest response, is to say "NO".

If we lose the battle with the FAA in trying to protect FPV (and we certainly will), we may completely lose our freedom to operate model airplanes. If you truly want to kill a hobby and associated legitimate businesses, let the government get involved. Do we really want to have local police watching every model airplane activity?

We should be able to demonstrate to the FAA that we can self police and relieve them of what they see as their obligation in this regard. I know that it is difficult for people and organizations thereof, to admit that they previously exercised bad

judgment. But, we must now divorce ourselves from any perception that a model airplane is a "drone".

I observed that the AMA actually had a booth and personnel present at the 2014 \*AUVSI convention in Orlando, Florida. Could you explain to the membership what you hoped to accomplish there? AMA funds must be plentiful to have spent several thousand dollars of our dues money for that venture.

So, it is my suggestion that the AMA agree with the FAA about FPV and get back to the AMA Safety Code relative to "line-of-sight" limitations.

Absolutely, the AMA should challenge the FAA ruling regarding prohibition of commercial activity with model airplanes. Denying pay for one's services seems beyond the FAA's power and seems contrary to the U.S. Constitution, and will cost thousands of jobs in the U.S.A..

Sincerely,



Bob Violett

Brief Bio: Former Navy Fighter/Attack pilot, airline pilot, model airplane pilot with many prestigious awards, AMA Hall of Fame member, and sUAS pilot at Aberdeen Proving Grounds in Maryland and Avon Park, Florida.

\*sUAS = Small Unmanned Aerial Systems

\*AUVSI = Association for Unmanned Vehicle Systems International