

## SUPPLEMENTAL STATEMENT

As a contracted research partner of the Federal Aviation Administration (“FAA”), BNSF Railway Company (“BNSF”) has been charged with assisting the FAA with research into integration of small unmanned aerial vehicles (“UAVs”) into the National Airspace System. BNSF is studying the innovative use of UAVs to promote safety and security for its railroad right-of-way and infrastructure. Recent press reports describe the efforts.<sup>1</sup>

One critical integration requirement has been the ability for BNSF pilots to communicate with other users of the airspace – including control towers, aircraft using advisory frequencies and others operating both ground and air based systems near BNSF’s right of way. The ability to use BNSF’s existing towers and communication capabilities allows BNSF to place aviation band radios at the proposed tower locations to provide BNSF’s remote UAV pilots access to listen and talk on the various channels provides the same communications capability as a standard general aviation pilot would have within a much larger aircraft. The ability for BNSF to have active participation on the proposed aviation channels is of major importance to the FAA and to other large stakeholders such as the United States Air Force.

BNSF has requested the frequency in the attached application to experiment with communication between UAV pilots based at ground stations and pilots and airport personnel. BNSF’s goal is to establish techniques for UAV communication that promotes safe and effective UAV operations. This frequency was not submitted with BNSF’s initial application, which has already been granted, while BNSF coordinated with Cannon Air Force Base. That coordination has concluded and a letter of consent to BNSF’s proposed operations is included herewith.

Should the Commission require additional information, it is asked to contact Greg Kunkle, Keller and Heckman LLP, 1001 G Street NW, Washington, DC, 20001; (202) 434-4178; kunkle@khlaw.com or Tim Doughty, (202) 434-4271; doughty@khlaw.com.

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<sup>1</sup> See e.g., Star-Telegram “BNSF Enters the drone age as FAA expands rules” (August 30, 2016) (<http://www.startelegram.com/news/business/article98807292.html>).

## **PURPOSE OF OPERATION/STOP BUZZER**

### **Purpose of Operation**

As explained in the initial application, BNSF Railway Company (“BNSF”) has been charged with assisting the FAA with research into integration of small unmanned aerial vehicles (“UAVs”) into the National Airspace System. BNSF is studying the innovative use of UAVs to promote safety and security for its railroad right-of-way and infrastructure. BNSF has requested the frequencies in the attached application to experiment with communication between UAV pilots based at ground stations and pilots and airport personnel.

The purpose of the operation is to establish techniques for UAV pilots and observers to communicate via voice radio with other aviation operations. Such communication will promote safe and effective UAV operations. One critical integration requirement has been the ability for BNSF pilots to communicate with other users of the airspace – including control towers, aircraft using advisory frequencies and others operating both ground and air based systems near BNSF’s right of way. The experiment will evaluate tower locations, equipment capabilities, and protocols for safe and secure operations.

### **Stop Buzzer**

The primary stop buzzer phone number is (505) 864-5595. The following backup number is also available: (505) 209-9430. The contact point for this experiment is “Pilot/Communications Officer”.

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