



Safety Message

March 2020—FAA RID NPRM and Spotting

It's been a fabulous month for flying aircraft – especially for February. By my observation, there has been someone flying at the field at least 21 days this month.

It's also been an interesting month as far as the FAA impinging on our hobby goes. The RID NPRM (Notice of Proposed Rule Making) has achieved over 30,000 comments on the online National Registry. There will likely be somewhere in the neighborhood of 5,000 additional comments submitted by fax or snail mail. Washington D.C. insiders are astounded at what they consider a very high volume of response. The EAA (Experimental Aircraft Association) and the AOPA (Aircraft Owners and Pilots Association) strongly encouraged their membership to support the hobbyists in making comments to the FAA – and they responded with a clear voice supporting us. March 2 is the last day to submit comments. If you would like to add your voice [comment HERE](#).

After March 2 the FAA is required by law to read every comment. Some have suggested this process alone could take as long as two years. Once the comment period is over discussion by the public with the FAA on this matter is over, but it's not time to relax. Congress can still interact with the FAA on this matter so the next phase of the campaign to “save the hobby” will be to carpet bomb congress and senate with well composed letters and try to get them to flying fields to see what the hobby is about. When writing your legislators it's critically important to make sure you **reference your comments are in regard to docket number FAA-2019-1100**. I've seen several replies from this state and others in which the specific issue was apparently unknown to the legislator and their comments were about completely different NPRM's or issues.

At the club meeting I addressed the protocol of having a spotter when flying. It's not critically important to have a spotter if you are the only pilot on the flight line – however if there are three or more pilots on the flight line utilizing spotters is necessary. If two pilots are standing proximal to one another they can communicate without a spotter – but having a spotter for them to share would be better yet. An additional set of eyes coupled with good communication can prevent mishaps and help make a safer and more enjoyable environment.

As a pilot you want to have a spotter you can trust – so (for example) if they tell you that you're landing to the side of the runway you don't discard their observation but reevaluate yours. An effective spotter doesn't chat with or otherwise distract the pilot and stands to the side and just behind the pilot so as not to be seen in their peripheral view. Finally, if you notice that there is a need for a spotter take initiative and approach the pilot and let them know you are approaching as their attention will be on the aircraft and you don't want to startle them.

My final words on spotting. It's the law that unmanned aircraft be observed from the pilots location. If the pilot is flying FPV then he/she must (by law) have a spotter proximal to them to observe the aircraft and advise the pilot if the aircraft is leaving the field of view. Beyond visual line of sight (BVLOS) operations without a *Part 107* license are both illegal and as such damage caused by BVLOS may be difficult of impossible to cover with insurance.

Fly safe, have fun, and support your club members.

An effective spotter:

- alerts the pilots to items that may be distracting outside their field of view.
- alerts pilot of obstacles in their flight path, including aircraft, birds, etc
- Reminds pilot of whatever they request, such as flap position, gear position, disable stabilization, etc.
- helps them line up for final approach
- Helps with trim switches when requested
- helps them when things go awry – such as getting a vector on a downed plane.

