



International Association of Fire Chiefs

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VIA ELECTRONIC FILING

Ms. Michelle Ferritto
ARM-100
Federal Aviation Administration
800 Independence Ave SW
Washington, DC 20592

RE: *Normalizing Unmanned Aircraft Systems Beyond Visual Line Of Sight Operations* [Docket No. FAA-2025-1908]

Dear Ms. Ferritto:

On behalf of the nearly 12,000 members of the International Association of Fire Chiefs (IAFC), I thank the Federal Aviation Administration and the Department of Transportation for the opportunity to submit comments on your proposal to further integrate drones into the national airspace system (NAS) - *Normalizing Unmanned Aircraft Systems Beyond Visual Line Of Sight Operations* [Docket No. FAA-2025-1908]. We appreciate the opportunity to comment on these proposals to ensure that America's fire and emergency services have safe and swift access to this revolutionary technology.

The first responder community has greatly benefited from being able to utilize unmanned aircraft systems (UAS) during their mission critical lifesaving tasks. When it comes to the fire and emergency services, we use UAS to establish situational awareness; provide real-time data and visual documentation of incident scenes; locate and communicate with victims stranded during water rescue operations of swollen rivers and waterways; transportation and delivery of life saving medication and medical tests; etc. Nonetheless, public safety's role can be limited or hindered due to the current Federal Aviation Administration's (FAA) beyond visual line of sight (BVLOS) rules.

The use of UAS by public safety is on the rise. Ultimately, the IAFC would want to ensure that future BVLOS rules will favor innovation and will not hinder public safety operations. We support a performance-based framework that maintains safety while recognizing that public safety missions are distinct from commercial delivery operations. Even though the delivery and retrieval of medical tests might see commercial company involvement, our missions provide a medically required necessary task. The FAA's BVLOS rules must reflect this reality, and our comments can help prevent public safety agencies from being hindered from using UAS.

The IAFC requests that the FAA explicitly accommodates public safety BVLOS—including Drone as a First Responder (DFR) and First Responder Tactical BVLOS (TBVLOS). This can be accomplished through a performance based, low altitude, shielded operations framework that is affordable, interoperable with Unmanned Aircraft System Traffic Management (UTM)/Automated

Data Service Provider (ADSP) services, and available to all public safety entities (including volunteer fire departments and non-governmental organization search and rescue), regardless of Public Aircraft Operation (PAO) status, Geographic Information System (GIS) enabled operations (pre incident planning, flight risk modeling, -real time airspace/state awareness, and -post incident evidence) are central to safe, repeatable BVLOS in the built environment. FAA should recognize GIS based risk assessment and dynamic geospatial constraints as acceptable mitigations that can substitute for -cost prohibitive equipage in low---risk, shielded, sub-400' profiles.

The requests below can begin to form the basis of more public safety agencies operating UAS in a manner that can increase safety for all and save more lives:

- Create an explicit Public Safety pathway in Part 108 that accommodates Drone as a First Responder (DFR) and tactical BVLOS at $\leq 400'$ above ground level under shielded, human-in-the-loop UAS operations.
- Preserve and integrate today's effective DFR/TCBVLOS waiver processes so public safety agencies do not lose operational gains.
- Ensure inclusivity beyond PAO status for volunteer fire companies and non-governmental search and rescue teams.
- Provide priority handling in UTM/ADSP for authenticated emergency flights,
- Accept GIS-based operational mitigations (route/altitude constraints, ground-risk scoring, dynamic geofences) in lieu of cost-prohibitive equipage for low-altitude, shielded profiles.

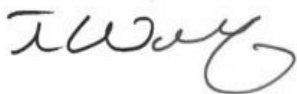
The FAA can take the following steps with this proposal to ensure the safe and swift operation of DFR and TCBVLOS flights:

- Establish a Part 108 Subpart PS—Public Safety BVLOS—covering DFR and TCBVLOS with performance-based approvals and standardized safety cases.
- Define shielded operations to include proximity to buildings and vertical infrastructure, not only terrain.
- Preserve current public safety BVLOS waivers or integrate their templates/process into Part 108 via the FAA's advisory circular.
- Ensure non-PAO public safety entities can qualify via Authority Having Jurisdiction (AHJ) authorization or a memorandum of understanding.
- Require ADSPs to recognize authenticated public safety "priority operations" for strategic deconfliction.
- Allow affordable detect-and-avoid mitigations for sub-400' shielded profiles using geospatial constraints and population density models.

- Provide connectivity resilient rules for disasters (offline geofences, local Remote ID reception, and incident command system [ICS] coordination).
- Clarify interaction with Special Governmental Interest (SGI)/FAA System Operations Support Center (SOSC) processes and Temporary Flight Restrictions (TFRs) in a single, public safety operations workflow.
- Create a Public Safety BVLOS micro-credential built on Part 107 with scenario-based ICS training and documented standard operating procedures.
- Offer non-binding guidance on data governance, privacy and cybersecurity to strengthen public trust.
- Adopt a phased transition plan and identify grant eligible equipment to avoid unfunded mandates.
- Recognize GIS as a primary safety layer; before, during, and after operations.

The IAFC appreciates the FAA's attempt to normalize UAS in BVLOS. An increase in public safety agencies operating UAS will lead to an increased ability to provide emergency response. These recommendations and requests will enable first responders to save lives while maintaining safety, accountability, and public trust—leveraging proven GIS-centered workflows for planning, real-time operations, and post-incident analysis. It is our hope that public safety continues to play a part in integrating UAS into the NAS.

Sincerely,



Fire Chief Trisha Wolford MBA, MS, EFO, CFO, FM, NRP
IAFC President and Board Chair 2025 – 2026

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