

**International
Association of
Amusement Parks
and Attractions**

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IAAPA Response to NTIA UAS Public Comment Request

Founded more than 90 years ago, IAAPA is the largest international trade association for permanently situated amusement facilities and attractions. IAAPA represents more than 4,500 facility, supplier, and individual members from more than 90 countries. Member facilities include amusement/theme parks, water parks, attractions, family entertainment centers, arcades, zoos, aquariums, museums, science centers, and resorts.

Safety is the number one priority for the attractions industry. IAAPA promotes the development of ride safety standards, working with ASTM International and other standards-setting groups worldwide to develop and update industry safety and maintenance requirements. This, in conjunction with state and local regulation of amusement rides and devices, has resulted in a strong safety record for the industry.

Safety is the primary focus of IAAPA's comments on the issues raised by the NTIA regarding the use of unmanned aircraft systems (UAS). In brief, IAAPA supports regulations that would allow of UAS for ride inspections. IAAPA is very concerned that UAS not be flown over its members' properties by persons not employed by or given permission by the facility operator. These concerns are based on safety and privacy.

Many IAAPA members operate amusement rides which are subjected to a rigorous course of daily, weekly, monthly, and annual inspections. These inspections are conducted by the operators, third parties hired by the operators, insurance companies, and governments.

Sections of some rides are located at considerable height. Others are difficult to access without scaffolding or other means that would require scheduling downtime. Inspection using UAS has the potential to enhance public safety by allowing inspections from viewing angles that cannot be achieved by other means. The ability to conduct at least some inspections of such parts of rides by UAS would be very valuable to IAAPA members.

Any use of UAS by an amusement park or attraction or their designee in proximity to persons not engaged in operating the UAS would be carefully controlled by the facility owner. This degree of control is impossible when hobbyists or others operate UAS near or over amusement parks and attractions. The safety risks posed to people on rides, watching shows, walking through the park, or working in it are considerable and outside the control of the facility operator.

A privacy concern exists in this area. Hobbyists or commercial UAS operators who do not have a facility owner's permission to fly near or over these facilities pose a threat to the intellectual property and other business interests of the attraction. A UAS flown over a ride under construction, for example, could provide its intellectual property to other parties who could copy the ride or post details of it online, damaging the facility's ability to successfully market the new ride.

Regional Offices:

IAAPA Asia Pacific
Hong Kong SAR, China

IAAPA Europe
Brussels, Belgium

IAAPA Latin America
México City, México

For all these reasons, IAAPA urges that the use of UAS be prohibited in or around amusement parks and attractions unless they are operated by the owner of the facility or with the permission of the owner.

In the area of transparency, the NTIA raises requirements of markings on a UAS to make clear who operates it. While in general IAAPA has no issue with this proposal, we urge that an exception be made for UAS used in theatrical productions within a confined area of the amusement park or attraction.

IAAPA appreciates that the NTIA is beginning a multistakeholder process to gain input on these important issues and will provide further comments as that process goes forward.

Respectfully submitted,

A handwritten signature in cursive script that reads "Randy Davis".

Randy Davis
Senior Vice President
Safety & Advocacy