



**National Rural Electric
Cooperative Association**

A Touchstone Energy® Cooperative 

April 20, 2015

National Telecommunications and Information Administration
U.S. Department of Commerce
1401 Constitution Avenue NW.
Room 4725, Attn: UAS RFC 2015
Washington, DC 20230
Sent via email to: UASrfc2015@ntia.doc.gov

Re: NRECA Comments to Docket No. 150224183–5183–01, RIN 0660–XC016, Privacy, Transparency, and Accountability Regarding Commercial and Private Use of Unmanned Aircraft Systems

Dear Mr. Verdi and Mr. Morris,

The National Rural Electric Cooperative Association (NRECA) appreciates the opportunity to submit comments to NTIA on its Request for Public Comment on Privacy, Transparency, and Accountability Regarding Commercial and Private Use of Unmanned Aircraft Systems (Docket No. 150224183–5183–01, RIN 0660–XC016). NRECA is supportive of NTIA’s efforts and its goal of promoting economic competitiveness while safeguarding privacy, civil rights, and civil liberties in domestic use of unmanned aircraft systems (UAS). As the national service organization for non-profit utilities with responsibility of constantly safeguarding consumer information related to energy use, as well as maintaining the Nation’s electrical grid while safeguarding privacy issues, NRECA will be a strong partner with NTIA in ensuring privacy, transparency and accountability during implementation of this emerging technology.

NRECA represents more than 900 not-for-profit rural electric utilities that provide electric energy to over 42 million people in 47 states. Electric cooperatives own and maintain 2.5 million miles or 42 percent of the nation’s electric distribution lines, covering 75 percent of the U.S. landmass. To give an example of the sheer distance of our systems, the power lines maintained by U.S. electric cooperative systems would stretch around the earth more than 100 times. We are therefore in a uniquely informed position to provide comments on this issue. Indeed, power line surveillance is noted in several instances in the notice of proposed rulemaking issued by the Federal Aviation Administration on its Proposed Rule governing the Operation and Certification of Small Unmanned Aircraft Systems (Docket No. FA-2015-0150; Notice No. 15-01) as a logical and predictable business application for small UAS, one which our members believe the technology is well-suited

Areas served by electric cooperatives, and the typical applications of UAS technology, are by their very nature low-risk for privacy issues. Since transmission and distribution lines are almost entirely protected by existing right-of-way limitations and easements, our members’ utility staff has regular access to these areas via both ground operations and through overhead surveillance using fixed-wing aircraft and helicopters. Moreover, these areas are predominantly rural with low-density populations. Electric cooperatives serve only 7.4 customers per mile of line, compared to 34 for IOUs and 48.3 for municipal utilities. As a result of our geography combined with the professional trade of utility work, privacy risks associated with the use of UAS by our member cooperatives are low and are relatively easily mitigated.

In addition to our members’ experience with privacy through construction, operation, and maintenance of three-quarters of the electrical grid by landmass, NRECA members have significant experience



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involving privacy issues from installing smart meters to processing detailed personal energy use patterns. NRECA and our members understand the importance of being proactive in communicating with electric cooperative consumers about new technology and protection of their privacy. NTIA should be confident that NRECA's network of over 900 cooperative utilities are willing and supportive partners on this issue and request through these comments that we be included in the ongoing conversations on this issue. While we do not have specific comments at this time on how the stakeholder work groups should be structured, we would like to be included as a stakeholder as NTIA develops an approach to stakeholder engagement.

In conclusion, NRECA's cooperative utilities are a unique and significant stakeholder to this comment process. We appreciate your consideration of our comments and look forward to engaging in this rulemaking process.

We would be happy to discuss any details of our comments and concerns as a follow-up.

Respectfully submitted,

A handwritten signature in black ink that reads "Keith Dennis".

Keith Dennis
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NRECA
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cc: Paul Breakman, NRECA