

## **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 frequencies 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.

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](mailto:kunkle@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>).