



December 30, 2019

The Honorable Marc Garneau, P.C., M.P.
Minister of Transport
Transport Canada
330 Sparks Street
Ottawa, Ontario
K1A 0N5

Dear Minister,

On behalf of the Board of Directors of Unmanned Systems Canada - Systèmes Télécommandés Canada (USC-STC), as well as our membership, and in my personal capacity as the incoming Chair of USC-STC, it is my pleasure to wish you congratulations on your re-election in the 43rd General Election. The USC-STC applauds the Government's continued trust in your leadership of our membership's regulator, Transport Canada.

I am hopeful that we will be able to meet in person in the new year to discuss the Government's priorities as they relate to this important, emerging industry. In the meantime, and in anticipation of continuing our collaborative efforts, we offer the following for your consideration.

Our Association was founded 17 years ago to represent the interests of the Remotely-Piloted Aircraft Systems (RPAS) industry. I am very pleased to be able to say that throughout, USC-STC has enjoyed an excellent relationship with the RPAS Task Force at Transport Canada. We thank you for your support of this relationship, which can be credited in part for the following accomplishments in 2019:

- the Release and Implementation of small RPAS regulations for Visual Line of Sight Operations;
- Beyond Visual Line of Site (BVLOS) testing, enabling the development of innovative solutions to address public safety concerns surrounding these technologies, which promise to deliver increased productivity and efficiency across many industries;

- a Commitment to release BVLOS regulations to start realizing the economic benefits to the Canadian economy of these technologies and to provide confidence to the broad RPAS investor community that Canada intends to lead; and
- the Establishment of a RPAS Traffic Management Action Team, chaired by Transport Canada and Nav Canada.

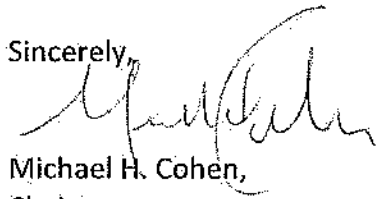
Looking forward to the Government's current mandate, it is our position that:

- Due to its role regulating Canada's transportation industries, Transport Canada is uniquely positioned to understand the implications of the technological changes driving rapid evolution in our industries. However, notwithstanding that the Government has identified RPAS technology as a Key Industrial Capability, it has not made a sufficient investment in the development of a domestic RPAS sector.
- We encourage the Government to prioritize the development of internal multidisciplinary and interdepartmental capacity with industry outreach across sectors to shape regulatory efforts and broader government policies.
- We call on the Government to support Transport Canada's efforts to implement industrial and educational programs and projects in pursuance of its Key Industrial Capability policies.
- We support Transport Canada's on-going development of Beyond Visual Line of Sight regulations. We hope for and encourage the inclusion of regulations applicable to larger RPAS during the Government's current mandate.
- We believe that a National RPAS Traffic Management system leveraging terrestrial, wireless, and satellite communications will ensure the safe integration of unmanned systems with manned systems into our domestic airspace. This will transform and increase efficiency in how our airspace is managed, but more importantly, it will contribute to the creation of new capacity within our economy to develop initiatives such as Smart Cities and the Internet of Things. Such integration and optimization of Canada's airspace is critical to our nation's efforts to meet its carbon reduction goals. More specifically, these benefits could include:
 - Improvements in the delivery of critical supplies within cities and to remote and Indigenous communities, allowing for more timely, cost-effective, and less energy-intensive movement of goods;

- More effective monitoring of energy-use and loss, facilitating more timely repairs and energy-consumption improvements to our buildings and other infrastructure; and
 - Improvements in surveying and monitoring capabilities, allowing new economic development in remote communities, particularly in Canada's Arctic regions.
- We encourage you to work with Minister of Infrastructure and Communities, Catherine McKenna and Minister for Innovation, Science, and Industry, Navdeep Bains to support the creation of a National RPAS Traffic Management System and the development of a broader Canadian RPAS industry. We urge the Government to support your efforts by properly funding this key National infrastructure initiative.

Thank you for your attention to these matters which are of foremost concern to our members. We are dedicated to continuing to work with Transport Canada to do our part in helping to create a Canada in which our members surpass challenges and realize opportunities at home and abroad, presented by these nascent, but quickly emerging technologies and markets.

Sincerely,



Michael H. Cohen,
Chairman

Unmanned Systems Canada-Systèmes Télécommandés Canada