



MOTION PICTURE ASSOCIATION
OF AMERICA, INC.
1600 EYE STREET, NORTHWEST
WASHINGTON, D.C. 20006
(202) 293-1966

National Telecommunications and Information Administration

**Proceeding on Transparency and Accountability Regarding Commercial and Private Use
of Unmanned Aircraft Systems**

Docket No 150224183-5183-01

Comments of the Motion Picture Association of America, Inc.

April 20, 2015

The Motion Picture Association of America and its members are excited to be on the forefront of domestic small unmanned aircraft systems use, having partnered with sUAS operators to secure cinematography as the first approved commercial application in the United States. Not only will continued development of sUAS make aerial photography even safer and help tell stories in exciting new ways, it will also help start generating the economic benefits that the technology can bring.

We have worked closely with the FAA to implement the use of these aircraft in our productions and are off to a great start, with a number of successful shoots in the United States already under our belt. As the voice for the motion picture, home video, and television industries, we and our members—Paramount Pictures Corp., Sony Pictures Entertainment Inc., Twentieth Century Fox Film Corp., Universal City Studios LLC, Walt Disney Studios Motion Pictures, and Warner Bros. Entertainment Inc.—look forward to further developing this budding sector of the film industry.

Although we recognize that small unmanned aircraft systems can raise privacy issues, our narrow and controlled use of sUAS doesn't implicate the “sustained, pervasive, and invasive” data collection that the NTIA inquires about, avoiding the need for additional safeguards. For example:

- We use sUAS on closed sets for filming movie and television content, and when filming with sUAS neither come into close contact with—nor engage in the “collection, use, retention, and dissemination” of data regarding—the general public.
- The FAA has authorized us to use aircraft: that weigh no more than 55 pounds (including camera); that fly no higher than 400 feet; that travel at speeds no greater than 50 knots; that remain within a visual line of sight of the operator; and that land within 30 minutes or with 25 percent power remaining, whichever comes first. Operators may not operate the sUAS from moving devices or vehicle. Most of our filming is done at 200 feet or

below at speeds no greater than 40 knots, and the average flight lasts less than 10 minutes because of power limitations. Consequently, the amount of footage we gather is constrained, especially since the production is under time and financial pressure to complete the shots—both aerial and otherwise—on the day’s call sheet.

- We provide disclosure to everyone on set during mandatory safety briefings, obtaining their consent before production begins, and the aircraft generate significant noise. As a result, everyone on the set has notice when sUAS are in use.

For these reasons, we do not believe any additional privacy practices are needed regarding our industry’s use of sUAS.

We look forward to continuing our work to further integrate the use of sUAS into domestic film and television productions, and are eager to see how the creative minds of our industry use the technology to the benefit of audiences around the world.

Respectfully submitted,



Neil Fried

Senior Vice President, Government and Regulatory Affairs
Motion Picture Association of America, Inc.
1600 I Street, NW
Washington, DC 20006
(202) 293-1966