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VIA Electronic Mail: UASrfc2015@ntia.doc.gov

National Telecommunications and Information Administration  
United States Department of Commerce  
1401 Constitution Avenue NW, Room 4752  
Attn: UAS RFC 2015  
Washington, DC 20230

**Re: Docket No. 150224183-5183-01; Privacy, Transparency, and Accountability  
Regarding Commercial and Private Use of Unmanned Aircraft Systems**

Dear Sir or Madam:

The American Insurance Association (AIA)<sup>1</sup> appreciates the opportunity to comment on the National Telecommunications and Information Administration's (NTIA) Request for Public Comment (RFC) regarding the development of an effective structure for multistakeholder engagement on best practices for privacy, accountability and transparency issues regarding commercial and private unmanned aircraft systems (UAS) use in the national air space (NAS).

The insurance industry's interest in the use of UAS is diverse and includes individual insurer use in underwriting, claims handling, and other customer service functions and the eventual development of a robust UAS insurance market. From an even broader point of view, UAS applications deployed by the businesses we insure hold a vast potential to increase worker safety, mitigate or prevent property damage and, ultimately, reduce the risk of loss faced by our customers in the pursuit of their businesses. AIA believes that incorporating UAS within insurer operations will bring significant benefits to the public, our customers, and our employees. With that background in mind, we provide the following thoughts to assist the NTIA as it begins the multistakeholder process of developing guidance and best practices for privacy, accountability and transparency.

We did not individually answer each of the questions identified in the RFC, but instead provide a couple of brief thoughts for your consideration. Generally, we believe that it would be helpful for stakeholders to distinguish between micro, small, and large UAS platforms when developing any guidance or best practices. Depending on the size of the UAS platform, there may be different accountability considerations. For example, it may make sense for large UAS's to have tail number identifications but

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<sup>1</sup> AIA is the leading property-casualty (p/c) insurance trade organization, representing approximately 325 insurers that write more than \$127 billion in premiums each year. AIA member companies offer all types of p/c insurance.

such a requirement would be impractical for a micro UAS. In addition, it would appear that the video and photo capturing uses by UAS raise the most privacy concerns. However, this concern is nothing new to the insurance industry, which has successfully managed personally identifiable information for decades. Many in the industry plan to utilize UAS to capture the same photographic data they are already capturing now and, accordingly, will apply the same strict privacy protections. Insurance carriers routinely capture images from roof tops or purchase satellite imagery as part of investigating claims. AIA would recommend using existing privacy policy as a model and simply focus on bringing UAS capabilities under the umbrella of those protections.

While our comments are minimal, we understand that this is the beginning of multistakholder engagement and we look forward to continuing to work with you on this important issue. Thank you again for the opportunity to comment and we are happy to answer any questions you may have.

Respectfully submitted,



Angela Gleason  
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American Insurance Association