



April 19, 2015

VIA EMAIL: UASrfc2015@ntia.doc.gov

The Honorable Lawrence E. Strickling
Assistant Secretary for Communications and Information
National Telecommunications and Information Administration
U.S. Department of Commerce
1401 Constitution Avenue NW
Washington, DC 20230

Re: UAS RFC 2015 – Docket No. 150224183-5183-01

Dear Secretary Strickling:

On behalf of Amazon and our customers, I am writing in response to NTIA's Request for Comment as the agency convenes a multi-stakeholder process to develop and communicate best practices for UAS privacy, transparency, and accountability. Amazon looks forward to participating in this forum and to providing additional comments in the course of its work.

Amazon Prime Air is a future delivery system designed to get packages to customers in 30 minutes or less using small unmanned aerial vehicles. We believe customers will love it, and we are committed to making Prime Air available worldwide as soon as we are permitted to do so.

At Amazon, our guiding principle for privacy is customer trust. We use information in a responsible, appropriate, and secure manner to innovate and improve customer experience, and we know that we must get privacy right to meet our customers' high expectations of us. We will use this same approach to privacy for Amazon Prime Air.

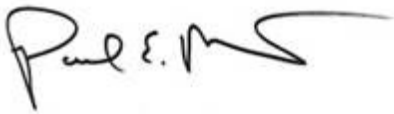
Consumer privacy is an area in which the US approach to UAS regulation already is particularly strong. We recognize that UAS technology could cause privacy infringement if commercial or private use is not undertaken in a sensible, privacy-conscious manner, so we welcome and support NTIA's leadership in developing best practices through the multi-stakeholder process.

The work of this forum is different than the previous two NTIA multi-stakeholder processes (on mobile application privacy and facial recognition), which were designed to establish specific and binding codes of conduct for well-developed technologies. By contrast, the UAS process is designed to develop best practices for an emerging technology for which regular commercial operation is still prohibited by US aviation authorities. Thus, the work of the UAS multi-stakeholder group should concentrate on general principles to help guide current and future technological development.

The questions posed in the RFC provide a strong outline for the work of the multi-stakeholder forum. Although it may make sense to create separate working groups for addressing the three principal areas in which the forum seeks to develop best practices, these areas also need to be considered collectively, and for all kinds of commercial and private UAS use.

Amazon is committed to ensuring that the collection and use of information for Prime Air is consistent with our customer-centric values, and we look forward to working with NTIA and other stakeholders to ensure that consumer privacy is protected as the myriad consumer benefits of innovative UAS technology become available.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Paul E. Misener". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Paul Misener
VP, Global Public Policy