

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	GN Docket No. 26-74
Unleashing American Drone Dominance	)	WT Docket No. 22-323
	)	WT Docket No. 24-629
	)	

**COMMENTS OF  
CONSUMER TECHNOLOGY ASSOCIATION**

Consumer Technology Association (CTA)<sup>1</sup> submits these comments to help the Commission accelerate safe, secure U.S. drone deployment and keep American leadership in unmanned aircraft systems (UAS).<sup>2</sup> CTA appreciates the opportunity to respond on how the Commission can accelerate safe, secure U.S. drone deployment and keep American leadership in unmanned aircraft systems (UAS), consistent with President Trump’s Drone Strategy.<sup>3</sup>

CTA represents the U.S. consumer technology industry, including UAS manufacturers, software developers and communications providers. CTA strongly supports policies that accelerate deployment of trusted American drone technologies, expand innovation, and strengthen U.S. competitiveness and national security.

As of 2024, drone sales in the US were estimated at more than \$6.5 billion and growing.<sup>4</sup> Analysis from Fact.MR suggests sales will reach over \$31 billion by 2034.<sup>5</sup> In support of the

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<sup>1</sup> As North America’s largest technology trade association, CTA® is the tech sector. Our members are the world’s leading innovators—from startups to global brands—helping support more than 17 million American jobs. CTA owns and produces CES®—the most powerful tech event in the world.

<sup>2</sup> *FCC Seeks Comment on Unleashing American Drone Dominance*, Public Notice, DA 26-314 (rel. Apr. 1, 2026)(Notice).

<sup>3</sup> Exec. Order No. 14307, 90 Fed. Reg. 24727 (June 11, 2025).

<sup>4</sup> *U.S. Drone Market Size & Growth Analysis By 2034*, Fact.MR (June 2024), <https://www.factmr.com/report/us-drone-market>.

<sup>5</sup> *Id.*

Administration's drone strategy, CTA members are investing substantially in the U.S. market. Earlier this year, Wing opened a manufacturing facility in Fort Worth, TX, an investment of tens of millions of dollars that will result in thousands of drones manufactured this year with plans for further expansion. Skydio last month announced it will invest \$3.5 billion over the next five years to expand domestic manufacturing, with plans to create over 2000 new jobs and support even more roles across the U.S. supply chain.<sup>6</sup> Other companies including KIHOMAC, Powerus, Performance Drone Works, and Anduril are in various stages of increasing American drone manufacturing.

CTA urges the Commission to adopt targeted, evidence-based rules rather than blunt restrictions. Rules should not sweep in low-risk technology providers or add extra compliance steps that do not improve safety or security. The FCC can strengthen domestic capacity with clear, innovation-friendly rules so safety, security, and competitiveness advance together, not at each other's expense.

In support of these goals, CTA recommends that the Commission (i) eliminate unnecessary rules that impede drone deployment, (ii) ensure access to sufficient spectrum to support drone operations, (iii) provide regulatory clarity and spectrum access to promote private investment and speed innovation, (iv) closely coordinate with other federal agencies to clarify roles and eliminate duplicative regulatory hurdles, and (v) streamline the experimental licensing process.

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<sup>6</sup> *Skydio Commits \$3.5 Billion to Expand U.S. Manufacturing and Secure American Drone Leadership*, Skydio (April 24, 2026), <https://www.skydio.com/blog/skydio-commits-usd3-5-billion-to-expand-u-s-manufacturing-and-secure-american-drone-leadership>.

## **I. Cut Unnecessary Rules That Slow Domestic Drone Deployment.**

The Commission should review and revise rules that create avoidable friction in equipment authorization, siting, airborne operations, and testing.<sup>7</sup> Current frameworks were not designed for the “scale, pace, and complexity” of modern UAS,<sup>8</sup> especially where testing involves multiple bands, mobile operations, or beyond visual line of sight (BVLOS) communications.

Many capabilities needed for scaled UAS operations are already proven. Millions of safe flights—including BVLOS operations and deployments using commercial cellular connectivity—show the technology is mature. The primary constraint on scale is policy, not capability.

To expedite drone deployment at scale, CTA recommends that the Commission:

- Clarify FCC obligations so that component vendors and limited-function providers are not regulated as full-service operators. Rules should not capture software, sensing, or connectivity providers whose role is limited and indirect.
- Eliminate duplicative or poorly targeted requirements that add cost without improving safety or security.
- Modernize device certification to support modular, software-enabled, and rapidly iterating systems. Processes should accommodate updates and integration of multiple communications functions without repeated bottlenecks.

## **II. Ensure Access to Sufficient Spectrum Through a Layered, Technology-Neutral Approach.**

Scalable and safe UAS operations need reliable spectrum access. Today, many drones use unlicensed bands, while the Commission is exploring additional options across licensed and

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<sup>7</sup> See Notice at 2.

<sup>8</sup> See *id.* at 5.

shared spectrum.<sup>9</sup> CTA supports an all-of-above approach for UAS operations, using licensed, unlicensed and shared spectrum.

The Commission should adopt a layered spectrum framework and prioritize enabling UAS operations over existing LTE and 5G networks, subject to appropriate safeguards. The fastest and most cost-effective path to scale leverages commercial infrastructure. This path avoids delays from building new, bespoke frameworks. The Commission should:

- Preserve and improve access to unlicensed spectrum for low-risk and entry-level use cases.
- Revisit outdated airborne restrictions—particularly in lower bands—in light of modern interference mitigation and network capabilities, while maintaining appropriate protections.
- Explore potential new spectrum allocations dedicated to UAS.
- Allow experimentation across additional bands for Detect and Avoid (DAA), radar, payload data, and secure navigation.

The Commission should not rely on a single-band model. A layered approach should support command-and-control, payload data, DAA and navigation across licensed, unlicensed, shared, and experimental access models.

### **III. Provide Regulatory Clarity and Spectrum Access to Promote Private Investment and Speed Innovation.**

Regulatory clarity and spectrum access are critical components for promoting private investment in the drone industry and for speeding both innovation and manufacturing.<sup>10</sup>

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<sup>9</sup> See, e.g., *Facilitating Opportunities for Advanced Air Mobility*, Notice of Proposed Rulemaking, FCC 25-7, ¶ 1 (rel. Jan. 17, 2025); see also Notice at 6-7.

<sup>10</sup> See Notice at 2.

#### **A. Clear, Durable Rules Will Spur Private Investment.**

The Commission can encourage private investment best by providing regulatory predictability. Firms invest where approval pathways are clear, rules are stable, and spectrum access is attainable.

Clarity is especially critical because the technical foundation for scale already exists; predictable rules will determine whether deployment occurs in the United States or elsewhere. First, overbroad regulation deters investment, especially for most CTA members which are small businesses and startups. Second, uncertainty diverts resources from innovation to compliance. Slow or opaque processes shift effort away from deployment and R&D. Third, the FCC should favor targeted incentives and flexibility over prescriptive mandates, including support for trusted suppliers, allied sourcing, R&D, and permitting reform.

#### **B. Regulatory Clarity and Technical Access Will Promote Innovation and Speed Manufacturing.**

UAS manufacturers need both clarity and practical access. Clarity means knowing how systems are authorized and how FCC processes align with the Federal Aviation Administration (FAA) and other requirements. Access means the ability to test, certify, and deploy on commercial timelines. The Commission should provide clear, administrable standards that allow trusted U.S. suppliers and those manufacturing in allied nations, to design, test, and deploy compliant systems without avoidable delay or duplicative review. The FCC should also reinforce trusted-system frameworks, such as Blue UAS and Green UAS, and align spectrum policy to accelerate adoption of secure, domestic platforms.

#### **IV. Coordinate Closely with Other Agencies, While Avoiding Duplication.**

The Commission's Public Notice emphasizes coordination with the FAA, National Telecommunications and Information Administration (NTIA), U.S. Department of Homeland

Security (DHS), the U.S. Department of War (DoW), and others.<sup>11</sup> CTA supports coordination, but it must remain risk-based and not become layered bureaucracy. Coordination should clarify roles, not multiply approvals. The Commission should:

- Align its spectrum policy with FAA operational requirements and NTIA planning.
- Coordinate trusted-supplier policies with DHS and DoW.
- Avoid duplicative obligations where other agencies are better positioned to regulate safety, airworthiness, or personnel.

#### **V. Streamline Experimental Licensing for Modern UAS Testing.**

Experimental licensing remains time-consuming and restrictive, particularly for multi-band, mobile, and BVLOS testing. CTA supports:

- Faster Part 5 decisions
- Broader geographic authority for mobile and corridor-based testing
- Multi-band authorizations for integrated systems
- Template or modular applications
- Expanded use of STAs for time-sensitive R&D<sup>12</sup>

### **Conclusion**

Streamlining these pathways will help translate proven capability into scale. The Commission has a real chance to align policy with what technology can already do and what global competition demands. The record is clear. The tools needed for safe, scalable UAS operations already exist. What we need now is a framework that moves deployment forward, not one that slows it down.

If the Commission updates outdated rules, uses existing infrastructure, strengthens trusted U.S. systems, and sets clear, durable guidance, it will speed up innovation here at home and ensure American companies lead the next generation of UAS.

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<sup>11</sup> *See id.* at 2-3, 5, 7.

<sup>12</sup> *See id.* at 5-6.

Respectfully submitted,

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