

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of	)	
	)	
Prohibiting the Importation and Marketing	)	PS Docket No. 26-189
of Certain Foreign-Produced	)	Public Notice DA 26-758
“Military-Grade” Unmanned Aircraft	)	91 Fed. Reg. 48870 (Aug. 3, 2026)
Systems and UAS Critical Components	)	
	)	

COMMENTS OF GOLD DOG STUDIOS LLC, d/b/a ROTOR RATE

Filed August 10, 2026

Supplements and expands the comment submitted via ECFS Express, confirmation no.
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I. INTRODUCTION AND STATEMENT OF INTEREST

Gold Dog Studios LLC, d/b/a Rotor Rate (“Rotor Rate”), respectfully submits these comments in response to the Commission’s Public Notice in the above-captioned proceeding [1].

Rotor Rate operates a pricing and business-management platform used by commercial drone operators flying under 14 C.F.R. Part 107. Our users are not defense contractors or large fleet operators. They are small businesses: solo roof and facade inspectors, two-person mapping and surveying firms, agricultural operators, volunteer search-and-rescue teams, small municipal public-safety units, and owner-operators who fly part-time alongside another job.

Because our platform exists to help those operators price work and track the true cost of running an aircraft, we have an unusually direct view of the economics at issue here: what equipment small operators actually own, what they paid for it, what a job pays, and what happens to a one-person business when a capital asset is written off years ahead of schedule. We offer that perspective to the record.

We support the Commission’s objective of securing the communications supply chain, and we do not ask the Commission to abandon it. We ask that the remedy be matched to the threat, and that the burden of the remedy not fall on the operators who are least able to bear it and least connected to the risk.

II. SUMMARY OF POSITION

In brief, Rotor Rate urges the Commission to:

- Define “military-grade UAS” by objective, published technical criteria, accompanied by an identifiable list of covered models, so that operators, dealers, insurers, and customs officers can determine coverage in advance;
- Apply any prohibition **prospectively**, and not to equipment already lawfully imported, authorized, and placed in service;
- Distinguish RF-critical components from non-RF imaging payloads such as thermal, LiDAR, and multispectral sensors;
- Provide a transition period of not less than 24 months for small operators and public-safety agencies;
- Expressly preserve firmware updates, replacement parts, batteries, and authorized repair for units already in service;
- Create a small-business hardship pathway for operators who cannot fund a domestic replacement at current prices; and
- Proceed by Notice of Proposed Rulemaking with a small-business economic-impact analysis, in coordination with the FAA, SBA, USDA, and DHS.

Each of these requests is developed below.

III. REGULATORY AND STATUTORY CONTEXT

This proceeding sits within a well-developed framework aimed at communications supply-chain risk. The Secure and Trusted Communications Networks Act of 2019 directed the Commission to identify communications equipment and services posing an unacceptable risk to national security, and the Commission maintains the resulting Covered List [2]. Separately, Congress has restricted federal *procurement* of certain foreign-produced UAS through the National Defense Authorization Act and the American Security Drone Act [3].

Those authorities share a common feature that we ask the Commission to preserve here: they principally govern what the federal government buys and what equipment may be authorized for use in communications networks. They do not, as a general matter, retroactively strip private small businesses of lawfully acquired capital equipment.

The action described in the Public Notice would go further, reaching importation and marketing of equipment already in commercial circulation, and would do so through a definitional category — “military-grade” — that has no settled meaning in Part 107 commercial practice. That combination, retroactive reach plus definitional uncertainty, is what produces the disproportionate small-business impact described in these comments.

IV. THE PROPOSED SCOPE EXCEEDS THE SECURITY CONCERN

The security interest animating this docket is the communications supply chain: the radio-frequency critical components that link an aircraft to a controller, to a ground station, to a cloud service, or to a foreign network. That is a legitimate and well-founded concern, and it is the concern the Commission’s existing authorities are built to address.

Thermal, LiDAR, and multispectral payloads are sensors. A thermal gimbal records infrared radiation. A LiDAR unit measures return time on its own emitted pulses. A multispectral array captures reflectance in fixed bands. None of these establishes a communications path on its own; each depends on the airframe’s RF stack for any transmission off the aircraft. Regulating the RF stack addresses the payload risk as well, because the payload cannot exfiltrate anything without it.

Treating imaging payloads as “UAS critical components” in their own right would therefore multiply the economic impact of a rule without a proportionate security benefit. It would also sweep in a large secondary market of payloads that operators purchased separately from their airframes, often financed on their own terms. We respectfully ask the Commission to draw the line at RF-critical components and to say so expressly in any rule text.

V. “MILITARY-GRADE” MUST BE DEFINED BY OBJECTIVE, PUBLISHED CRITERIA

As presently framed, “military-grade” is not defined with sufficient precision for a regulated party to determine coverage in advance. The phrase is used colloquially in drone marketing to describe ruggedization, ingress protection, encrypted links, extended

range, thermal sensitivity, or simply durability. A rule keyed to that phrase, without published criteria, would leave the following unanswered:

- Does a commercially available thermal payload with a given sensor resolution become “military-grade” at some threshold, and if so, what threshold?
- Does AES-encrypted command-and-control — a feature the security community generally encourages — render an aircraft “military-grade”?
- Does a weather-sealed airframe rated for sustained wind qualify, given that inspection work routinely requires it?
- Is coverage determined at the model level, the configuration level, or the individual-payload level?

The practical consequence of leaving these open is not merely litigation risk. It is an immediate freeze. Lenders will not finance an asset whose legality is undetermined; insurers will not quote it; dealers will not stock it; and operators will not bid multi-year contracts against it. Regulatory uncertainty imposes costs long before any rule takes effect, and those costs are borne first by the smallest firms, which have the least ability to hold inventory or absorb a stalled quarter.

We therefore urge the Commission to publish objective technical criteria and an identifiable list of covered models, updated through a transparent process, before any prohibition attaches.

VI. MARKET REALITY: CONCENTRATION, PRICE, AND THE ABSENCE OF SUBSTITUTES

The U.S. commercial UAS market is highly concentrated in foreign-produced platforms. Industry analyses place the leading foreign manufacturer’s share of the U.S. commercial market at roughly 70 percent or more, with a still larger share of the global consumer market [4]. The Department of Commerce has separately observed the dominance of foreign-produced UAS in the domestic market [5].

That concentration is not a statement about operator indifference to security. It is a statement about price and availability at the capability tier small operators need. A foreign-produced enterprise platform with a thermal or zoom payload commonly sells in the \$10,000 to \$25,000 range. By comparison, an NDAA-compliant Inspired Flight IF800 thermal inspection kit is listed at approximately \$52,650, and its LiDAR mapping kit at approximately \$57,340 [6][7]. A WingtraOne Gen II mapping platform ranges from roughly \$19,900 to \$42,900 depending on payload [8].

For a one-person Part 107 business, a \$20,000 to \$40,000 per-airframe gap is not a line item to be absorbed. On the job economics we observe, an inspection operator billing in the low hundreds of dollars per flight must complete a great many additional revenue flights, net of fuel, travel, insurance, software, and processing time, simply to close that gap on a single aircraft — and must do so while the aircraft being replaced still works. Appendix A sets out an illustrative comparison.

We note for the record that this is not an argument against domestic manufacturing. It is an argument about sequencing: a prohibition that removes affordable equipment before comparable domestic equipment is available at comparable price does not transfer demand to U.S. manufacturers. It suppresses the demand entirely, because the small operator exits rather than upgrades.

VII. SECTOR-BY-SECTOR IMPACT ANALYSIS

The Commission's Public Notice addresses equipment categories. The effects, however, land on specific kinds of work. We summarize the verticals our users operate in, and then discuss the safety-relevant ones in more detail.

Vertical	Typical equipment tier	Realistic substitute if unavailable
Roof, facade, and tower inspection	Enterprise airframe with thermal and zoom payload	Ladder, rope access, or bucket truck
Energy and utility inspection	Thermal and zoom, occasionally LiDAR	Manned helicopter patrol or climbing crews
Agriculture (scouting and spray)	Multispectral scouting; dedicated spray aircraft	Manned low-altitude application; ground rigs
Search and rescue / public safety	Thermal-equipped small airframe	Ground search on foot; delayed air assets
Surveying, mapping, construction	RTK mapping airframe, sometimes LiDAR	Ground survey crews; longer schedules
Insurance claims and catastrophe response	Thermal and high-resolution zoom payload	Adjuster on the roof; slower claim cycle
Telecom towers and antenna audits	Zoom, thermal, occasionally LiDAR	Tower climber; higher exposure and cost
Mining, aggregates, and stockpile volumetrics	RTK or LiDAR mapping airframe	Ground survey; less frequent measurement
Real estate and media	Consumer or prosumer airframe	Ground photography; reduced service offering

A. Roof, facade, and infrastructure inspection

Drone inspection exists primarily to remove a human being from a height. OSHA and the Bureau of Labor Statistics identify falls to a lower level as the leading cause of construction fatalities, with roof and height-related falls a significant subset [9][10]. OSHA continues to treat roofing and tower work as high-hazard occupations.

The counterfactual matters here. If an operator cannot obtain or maintain an affordable thermal- and zoom-equipped aircraft, the work does not migrate to a \$52,000 domestic platform; the operator does not have \$52,000. In our experience the work migrates back

to a ladder, a rope, or a bucket truck, or to a general contractor who never used a drone in the first place. The net effect of the rule in this vertical is measured in climbs, not in units sold.

B. Agriculture

Agricultural aviation is one of the highest-risk segments of civil aviation. The NTSB's Special Investigation Report on Agricultural Aircraft Operations documented 78 agricultural aviation accidents in 2013 alone [11]. Spray and scouting drones displace some portion of that low-altitude manned exposure, and they do so at a price point family farms and small custom applicators can reach.

Congress is separately considering tariffs and per-unit fees on foreign-produced agricultural spray drones [12]. Layering a retroactive importation and marketing prohibition on top of those measures would compound pressure on both new units and the replacement-parts channel that keeps existing units airworthy through a season. Where the substitute is manned application, the safety trade is adverse.

C. Search and rescue

Peer-reviewed research has found that drone support reduces the treatment-free interval in simulated mountain rescue with telemedical support [13]. The teams performing this work are overwhelmingly volunteer or small-municipal. They operate thermal aircraft costing from a few thousand dollars to roughly \$15,000, frequently funded by donation or a single grant cycle.

For those teams, a \$50,000 alternative is not a more expensive option; it is the end of the program. The realistic fallback is a slower ground search, at night, with worse outcomes for the missing person. We urge the Commission to treat public-safety and volunteer SAR use as a category warranting express transition relief.

D. Public safety and drone-as-first-responder

Public-safety agencies have filed in this docket describing the operational consequences of a retroactive prohibition on drone-as-first-responder programs [14]. Municipal budgets are fixed and appropriated on annual cycles. Even an agency that fully intends to transition to domestic aircraft cannot compress procurement, training, policy revision, and community notification into the interval contemplated by an immediate rule. A phase-in is the difference between an orderly transition and aircraft grounded mid-cycle.

VIII. FISCAL AND LOGISTICAL IMPACT ACROSS THE VALUE CHAIN

The preceding section describes the work that stops. This section describes where the cost lands. In our observation the burden does not stay with the pilot who owns the aircraft; it moves up the chain to the firms and institutions that buy drone data, and it moves there as schedule delay and unit-cost inflation rather than as a visible equipment line item.

A. Micro tier: the individual Part 107 business

The FAA reports on the order of hundreds of thousands of certificated remote pilots and registered commercial small UAS [17]. The overwhelming majority of the firms behind those numbers are sole proprietorships and micro-businesses. For that population the fiscal mechanics of a retroactive rule are as follows:

- **Immediate asset write-down.** An airframe purchased on a three-to-five-year depreciation schedule and prohibited in year two is written off with unrecovered basis, while any financing or lease obligation on it survives.
- **Loss of collateral and credit.** Equipment loans and small-business lines are frequently secured by the aircraft itself. A prohibited asset is not collateral, which can impair borrowing capacity precisely when replacement capital is needed.
- **Insurance and contract friction.** Hull coverage, client insurance riders, and master service agreements are written against specific listed aircraft. Every substitution triggers re-underwriting, re-approval, and in many cases re-badging on a client site.
- **Retraining and re-qualification.** Switching platforms means new flight-control behavior, new payload calibration, new data pipelines, and new deliverable QA. That is unbillable time for a firm whose only inventory is billable hours.
- **Payload orphaning.** Thermal and LiDAR payloads are frequently bought separately, financed separately, and mounted to a specific airframe ecosystem. A prohibition reaching those payloads strands a second capital asset on top of the first.

These effects compound. A micro-business does not experience them as five separate costs; it experiences them as one quarter without revenue, which for a firm without a cash reserve is an exit rather than a transition.

B. Middle tier: service providers, dealers, insurers, and trainers

Between the individual pilot and the enterprise customer sits an intermediate industry that is rarely counted in equipment rulemakings but absorbs a substantial share of the disruption:

- **Drone service providers and pilot networks.** Regional and national providers subcontract work to independent Part 107 pilots and price fixed-rate contracts against an assumed supply of qualified aircraft. If a meaningful fraction of that subcontractor pool loses its equipment, the provider must either raise contracted rates mid-term or fail to cover its service area.
- **Dealers, integrators, and repair shops.** Inventory purchased in reliance on lawful importation becomes unsellable, and an authorized-repair business built around a prohibited platform loses its parts channel and its book of work simultaneously.
- **Insurers and brokers.** Aviation underwriters price hull and liability against known loss history on known platforms. A forced migration to unfamiliar airframes with thin actuarial history introduces pricing uncertainty that is typically resolved in the direction of higher premiums for every operator, including those whose equipment is unaffected.

- **Training providers and educational programs.** Community-college and workforce UAS programs are equipped on multi-year grant cycles. Retroactive coverage of training fleets converts an awarded grant into a stranded expense and interrupts the domestic pipeline of qualified operators the Commission's own policy goals depend on.

This tier is where a rule aimed at hardware becomes a labor-supply problem. Enterprise buyers do not contract with airframes; they contract with providers who guarantee coverage, turnaround, and insurance. Thinning the operator pool degrades all three at once.

C. Macro tier: asset owners and regulated industries

The largest fiscal effects are felt by the institutions that buy drone data as an input to maintaining physical assets. In each case the alternative to the drone is not a different drone; it is the older, slower, more expensive method the drone replaced.

Industry	How drone data is used	Consequence of reduced capacity
Electric utilities and energy infrastructure	Thermal scans of conductors, splices, substations, and solar arrays; storm damage assessment	Return to manned helicopter patrol or climbing crews at materially higher cost per mile; longer outage restoration
Oil, gas, and pipeline	Methane and thermal survey, flare and tank inspection, right-of-way patrol	Fewer inspection cycles per year; leak and corrosion findings shift later in the failure curve
Agriculture	Multispectral scouting, stand counts, irrigation and drainage diagnosis, targeted application	Whole-field application instead of prescription application; higher input spend per acre and reduced yield precision [19]
Insurance carriers and catastrophe response	Roof and property inspection, post-event damage triage at scale	Slower claim cycle times, more adjuster roof climbs, higher loss-adjustment expense after a catastrophe
Telecommunications	Tower and antenna audits, close-visual inspection, as-built verification	More climbs on structures OSHA identifies as high-hazard [20]; slower network build and upgrade schedules
Construction and AEC	Progress documentation, volumetrics, as-built and RTK survey	Reversion to ground survey crews; schedule slip and weaker dispute documentation
Transportation and rail	Bridge, culvert, track, and right-of-way inspection	Renewed reliance on under-bridge units, lane closures, and confined-space entry

Two features of this table deserve emphasis. First, the substitute method is in nearly every row **more dangerous**, not merely more expensive: a helicopter patrol, a tower

climb, a bucket truck, a confined-space entry. Second, the substitute is **slower**, which reduces inspection frequency. Reduced inspection frequency on energy, telecom, and transportation assets is itself a resilience and reliability concern, and one the Commission has an independent interest in with respect to communications infrastructure.

These industries are not, for the most part, buying the aircraft. They are buying flights from small vendors. A rule that removes the small vendor's aircraft therefore appears on the asset owner's books not as an equipment cost but as an inspection-program cost increase and a maintenance-schedule delay, arriving without a budget line to absorb it.

D. Logistical timing: the sequencing problem in practical terms

Even where a domestic replacement exists and is funded, the transition is not instantaneous. A realistic path runs through procurement approval, order lead time, delivery, payload configuration, pilot transition training, client and insurer re-approval, data-pipeline revalidation, and in regulated environments a documented change to inspection procedure. Enterprise and municipal buyers work on annual appropriation cycles; agricultural buyers work on a single planting-and-application season; catastrophe response works on the calendar of the storm.

A prohibition whose effective date is shorter than those cycles does not accelerate the transition. It creates an inspection gap of the difference. The Commission can eliminate that gap at essentially no cost to the security objective by pairing any prohibition with the 24-month transition and continued-support provisions requested in Section XII.

IX. THE “CONTINUED USE” EXEMPTION IS INCOMPLETE

The Public Notice exempts continued use or operation of already-purchased UAS. That protection is meaningful, and we thank the Commission for including it. It is, however, incomplete in a way that materially changes its practical value.

A prohibition on importation and marketing would still terminate the supply of replacement parts, batteries, gimbals, and authorized repair, and would place firmware updates and support in doubt. Small UAS are consumable-intensive: batteries degrade on a charge-cycle basis, props and arms are routinely replaced, and gimbals are the most commonly damaged assembly on an inspection aircraft. An airframe that cannot be maintained is a grounded airframe within a small number of years, and an airframe that cannot receive firmware updates raises its own safety and airspace-compliance questions as FAA requirements evolve.

The result is that a nominal “continued use” exemption operates as a delayed prohibition with an undefined expiration date. We ask that any rule expressly preserve parts, batteries, firmware, and authorized repair for units already in service — which is consistent with the Commission's stated intent, and which materially reduces the economic impact without expanding the population of covered aircraft.

X. DOMESTIC MANUFACTURING CAPACITY AND THE TIMING PROBLEM

The Public Notice cites substantial new investment in U.S. drone manufacturing. We take that at face value and we welcome it. Rotor Rate’s users would be direct beneficiaries of a competitive domestic market with real price pressure in the \$5,000 to \$20,000 enterprise tier.

The difficulty is sequencing. Announced investment is not delivered inventory, and delivered inventory is not a mature support ecosystem — dealers, trained technicians, parts depots, payload options, financing, and insurance familiarity all lag the first shipping unit by years. A prohibition that takes effect before that ecosystem exists does not reallocate demand; it strands it.

A 24-month transition, tied to objective availability criteria, gives domestic manufacturers the demand signal without asking the smallest operators to fund the gap out of their own capital. We would support the Commission periodically reviewing domestic availability at defined capability tiers and price points as part of that transition.

XI. PROCEDURAL REQUESTS: RULEMAKING AND SMALL-BUSINESS ANALYSIS

A Public Notice is an appropriate way to gather a record. It is not, in our respectful view, an adequate vehicle for a prohibition of this economic scope. We ask the Commission to:

- Issue a Notice of Proposed Rulemaking containing the exact definitions, covered-equipment criteria, effective dates, and exemptions it intends to adopt, so that the public comments on rule text rather than on a description of it;
- Provide a comment and reply-comment cycle long enough for trade associations, first-responder organizations, and agricultural groups to gather member-level economic data;
- Prepare a small-business economic-impact analysis consistent with the Regulatory Flexibility Act, including the number of affected Part 107 businesses and the per-firm capital cost of compliance [15];
- Coordinate with the FAA so that any prohibition harmonizes with registration, Remote ID, and operational authorizations, and with the SBA, USDA, and DHS on small-business, agricultural, and public-safety impacts.

We note that the record in this docket already contains a substantial volume of filings from individual small operators and public-safety agencies [16]. That participation is itself evidence that the affected population is small-business dominated, and that a Regulatory Flexibility analysis would be informative rather than pro forma.

XII. RECOMMENDED RELIEF

Rotor Rate respectfully requests that the Commission:

- (a) Define “military-grade” using objective, published technical criteria, accompanied by an identifiable list of covered models and a transparent update process;

- (b)** Apply any prohibition prospectively, and not to equipment already lawfully imported, authorized, and placed in service;
- (c)** Distinguish RF-critical components from non-RF imaging payloads, including thermal, LiDAR, and multispectral sensors, and state that distinction expressly in the rule text;
- (d)** Provide a transition period of not less than 24 months for small operators, volunteer search-and-rescue organizations, and public-safety agencies;
- (e)** Expressly preserve firmware updates, replacement parts, batteries, and authorized repair for units already in service;
- (f)** Establish a small-business hardship pathway, including for volunteer and grant-funded public-safety users, where a domestic replacement is unavailable at a comparable price and capability;
- (g)** Tie any transition milestone to published, objective findings on domestic availability at defined capability tiers and price points; and
- (h)** Proceed by Notice of Proposed Rulemaking accompanied by a small-business economic-impact analysis, developed in coordination with the FAA, SBA, USDA, and DHS.

XIII. CONCLUSION

Securing the communications supply chain and preserving small-business aviation safety are not competing objectives. A rule that is narrow in scope, prospective in application, precise in its definitions, and realistic in its timing can accomplish both. A rule that is broad, retroactive, and undefined will not measurably improve supply-chain security, but it will remove working aircraft from the hands of inspectors, farmers, surveyors, volunteer rescue teams, and small public-safety units who are not the source of the risk.

Rotor Rate appreciates the opportunity to participate in this proceeding and is prepared to supply additional operator-level economic data at the Commission's request.

Respectfully submitted,

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APPENDIX A — ILLUSTRATIVE ACQUISITION COST COMPARISON

Figures below reflect publicly listed configurations as of August 2026 and are provided for illustration of the order-of-magnitude gap, not as a quotation. Foreign-produced ranges reflect commonly observed street pricing for enterprise-tier airframes with the stated payload class.

Capability needed	Foreign-produced enterprise tier	NDAA-compliant U.S. option	Approx. gap
Thermal inspection	\$10,000 – \$25,000	Inspired Flight IF800 thermal inspection kit, approx. \$52,650 [6]	\$27,000 – \$42,000
LiDAR mapping	\$15,000 – \$30,000	Inspired Flight IF800 LiDAR mapping kit, approx. \$57,340 [7]	\$27,000 – \$42,000
Fixed-wing / RTK mapping	\$10,000 – \$25,000	WingtraOne Gen II, approx. \$19,900 – \$42,900 by payload [8]	\$0 – \$32,000
Volunteer SAR thermal	\$3,000 – \$15,000	Nearest compliant thermal platform commonly \$50,000+	\$35,000 – \$47,000

The relevant figure for a small operator is not the sticker price but the replacement gap against an aircraft that is still airworthy and still earning. Under a retroactive rule, that gap is realized immediately and in full, against a capital asset whose remaining useful life is written off rather than recovered.

APPENDIX B — SOURCES AND REFERENCES

- [1] Federal Communications Commission, Public Notice DA 26-758, *Prohibiting the Importation and Marketing of Certain Foreign-Produced Military-Grade UAS and UAS Critical Components* (rel. July 21, 2026); 91 Fed. Reg. 48870 (Aug. 3, 2026). <https://docs.fcc.gov/public/attachments/DA-26-758A1.pdf>
- [2] Secure and Trusted Communications Networks Act of 2019, Pub. L. No. 116-124; FCC, *List of Equipment and Services Covered By Section 2 of the Secure Networks Act*. <https://www.fcc.gov/supplychain/coveredlist>
- [3] American Security Drone Act of 2023, enacted as part of the National Defense Authorization Act for Fiscal Year 2024, Pub. L. No. 118-31 (federal procurement restrictions on certain foreign-produced UAS). <https://www.congress.gov/bill/118th-congress/house-bill/2670>
- [4] Special Competitive Studies Project, *2025 Gaps Analysis — Commercial Drones* (U.S. commercial market share estimates). <https://www.scsdp.ai/reports/2025-gaps-analysis/>
- [5] U.S. Department of Commerce, International Trade Administration, *Unmanned Aircraft Systems (UAS)*. <https://www.trade.gov/unmanned-aircraft-systems>
- [6] Inspired Flight Technologies, IF800 NDAA-Compliant Thermal Inspection Kit (published configuration price). <https://shop.inspiredflight.com/products/if800-ndaa-compliant-thermal-inspection-kit>
- [7] Inspired Flight Technologies, IF800 Basic LiDAR Mapping Kit (published configuration price). <https://shop.inspiredflight.com/products/if800-basic-lidar-mapping-kit>
- [8] Wingtra AG, WingtraOne Gen II published configuration pricing by payload. <https://wingtra.com/>
- [9] U.S. Department of Labor, Occupational Safety and Health Administration, *Stop Falls / Fall Prevention Campaign* (construction falls are the leading cause of death). <https://www.osha.gov/stop-falls>

- [10] U.S. Bureau of Labor Statistics, *Census of Fatal Occupational Injuries* (construction fatalities from falls to a lower level). <https://www.bls.gov/iif/oshcfoi1.htm>
- [11] National Transportation Safety Board, *Special Investigation Report on the Safety of Agricultural Aircraft Operations*, NTSB/SIR-14/01 (2014).
<https://www.nts.gov/safety/safety-studies/Documents/SIR1401.pdf>
- [12] Drones for America Act, S. 2168, 119th Cong. (proposed tariffs and per-unit fees on certain foreign-produced agricultural UAS). <https://www.congress.gov/bill/119th-congress/senate-bill/2168>
- [13] *Drones reduce the treatment-free interval in search and rescue operations with telemedical support*, PubMed ID 36680868. <https://pubmed.ncbi.nlm.nih.gov/36680868/>
- [14] Filings of public-safety agencies and individual operators, PS Docket No. 26-189, FCC Electronic Comment Filing System.
[https://www.fcc.gov/ecfs/search/search-filings/results?q=\(PS%20Docket%20No.%2026-189\)](https://www.fcc.gov/ecfs/search/search-filings/results?q=(PS%20Docket%20No.%2026-189))
- [15] Regulatory Flexibility Act, 5 U.S.C. §§ 601–612. <https://www.sba.gov/advocacy/regulatory-flexibility-act>
- [16] Gold Dog Studios LLC d/b/a Rotor Rate, ECFS Express Comment, PS Docket No. 26-189, filed Aug. 10, 2026, confirmation no. 2026081027332406.
<https://www.fcc.gov/ecfs/filing/status/detail/confirmation/2026081027332406>
- [17] Federal Aviation Administration, *UAS by the Numbers* (registered commercial small UAS and certificated remote pilots). https://www.faa.gov/uas/resources/by_the_numbers
- [18] Federal Aviation Administration, *FAA Aerospace Forecast* (commercial small UAS fleet projections).
<https://www.faa.gov/dataresearch/aviation/aerospace-forecasts>
- [19] U.S. Department of Agriculture, National Agricultural Statistics Service, *2022 Census of Agriculture* (farm counts and precision-agriculture technology use). <https://www.nass.usda.gov/AgCensus/>
- [20] Occupational Safety and Health Administration, *Communication Tower Safety*.
<https://www.osha.gov/communication-tower>

All factual assertions in these comments are drawn from publicly available primary sources or from Rotor Rate’s own observation of operator economics on its platform. Price figures reflect publicly listed configurations as of August 2026 and are subject to change. Where a figure is presented as a range or an estimate, it is identified as such.