Oregon
Tina Kotek, Governor

Oregon Department of Aviation
3040 25th Street SE
Salem, OR 97302-1125
Office: 503-378-4880

OREGON
Department of Aviation

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

Comments from the Oregon Department of Aviation

The Oregon Department of Aviation submits these comments in response to the Public Notice seeking comment on actions the Federal Communications Commission can take to advance American drone dominance. Oregon appreciates the Commission's recognition that spectrum policy, experimental licensing, equipment authorization, and federal coordination all play an important role in whether uncrewed aircraft systems can be deployed safely, reliably, and at meaningful scale.

The Oregon Department of Aviation was established to promote, develop, and improve aviation in Oregon. In that role, the Department works across a large and diverse geography that includes rural communities, mountainous terrain, wildfire-prone landscapes, coastal environments, and medically underserved areas where aviation is often essential to public safety, emergency response, and economic resiliency. Oregon therefore views this proceeding as a practical opportunity to improve the communications and regulatory framework needed to support real-world UAS operations that serve the public.

For states like Oregon, the most pressing need is a regulatory environment that allows trusted operators to conduct safe, repeatable, and scalable operations in the places where uncrewed aviation can deliver the greatest public benefit. That includes wildfire detection and response, infrastructure inspection, emergency management, search and rescue support, medical and pharmacy delivery, and drone as first responder operations in both rural and urban settings. These operations often involve long distances, complex terrain, sparse infrastructure, and communications environments that do not fit neatly within legacy assumptions about aircraft communications or short-range consumer devices.

The Commission's Public Notice correctly recognizes that current FCC processes can create friction for UAS deployment and that the existing experimental licensing framework was not designed for the scale, pace, and complexity of modern UAS operations. It also correctly recognizes the importance of spectrum access for beyond visual line of sight operations, the

need to modernize coordination, the value of innovation zones, and the practical importance of assisting public safety entities and other operators in navigating the Commission's equipment, licensing, and national security requirements. Oregon strongly supports those objectives and offers the following recommendations.

I. The Commission should modernize its experimental licensing framework for UAS operations.

Oregon supports substantial reform of the Commission's Part 5 experimental licensing framework as applied to UAS communications systems. The existing process can be too slow, too narrow geographically, and too cumbersome for corridor-based, mobile, and iterative testing. Those constraints may be manageable for limited campus research or small laboratory experiments, but they are poorly matched to the communications needs of operationally relevant UAS testing.

For state-supported public-interest operations, a more flexible model is needed. The Commission should create a UAS-specific experimental license pathway that allows broader geographic authority, longer terms, faster modifications, streamlined renewals, and multi-band testing under a single authorization where appropriate technical showings are made. The Commission should also consider a modular approach that permits applicants to select from pre-approved operational categories, technical parameters, and safety conditions. That kind of framework would reduce administrative burden while preserving protection against harmful interference.

The Commission should also make greater use of blanket authorizations and temporary authority mechanisms for qualified entities operating in defined corridors, testbeds, and public-private programs. State aviation agencies, public entities, designated test partners, and operators working on public-safety and infrastructure missions should not be forced to restart the approval process every time they need to adjust a route, expand an operating area, or test across multiple communications modalities. A system designed around narrow, static sites will not support the scale of testing needed to mature BVLOS, detect-and-avoid, resilient command and control, and navigation systems.

In Oregon, communications testing for UAS cannot be confined to a single flat site or a small academic footprint. The systems that are likely to matter most for future deployment must be evaluated across real terrain, varying elevations, changing weather patterns, and dispersed communities. The Commission's licensing framework should reflect that reality.

II. The Commission should establish or support additional innovation zones and testbeds in rural and mountainous environments.

Oregon strongly supports the creation of additional innovation zones and testbeds for UAS operations, particularly in sparsely populated and mountainous regions where the risk of

harmful interference may be relatively limited and where the operational value of UAS deployment is especially high.

The Public Notice asks whether the Commission should consider new testbeds in deserts or mountains and whether existing innovation zone models provide sufficient flexibility or capacity. Oregon believes the answer is yes. ODAV has already identified three areas including one in the Cascades near Oakridge, OR, another along the Columbia River Gorge between Oregon and Washington and one in southeast Oregon. New rural and mountainous test environments are needed, and they should not be viewed as peripheral. They are central to the future of uncrewed aviation.

The environments that matter most for wildfire response, emergency logistics, infrastructure inspection, and rural access are often not urban university corridors. They are mountain passes, forested regions, river corridors, remote road networks, and communities with limited transportation alternatives. These are the places where communications resilience, line-of-sight obstruction, weather variability, and route continuity become decisive. They are also the places where the public benefits of UAS deployment are often the greatest.

The Commission should therefore create a pathway for state-supported innovation zones or corridor-based test environments that can be used by multiple qualified entities under common technical and safety rules. These zones should be structured to support civil and public-interest use cases, not solely defense or academic research. These would also support economic activity by attracting UAS businesses that would enhance many rural economies. The Commission should coordinate with the FAA and NTIA to enable corridor-based testing that reflects real operating environments and supports recurring operations, rather than isolated demonstrations.

A rural and mountainous innovation-zone model would also produce a better record for future rulemaking. It would help federal agencies understand how communications systems perform where terrain, coverage, and infrastructure present the hardest problems and help determine where reliance on one type of system would be inappropriate. It would also support development of best practices that are directly relevant to the communities that stand to benefit the most from UAS services.

III. The Commission should accelerate practical access to reliable spectrum for safety-critical UAS operations.

Oregon supports the Commission's efforts to improve access to sufficient spectrum for UAS testing and operations, including services to the public. The Department agrees that reliance on unlicensed spectrum alone is not a complete long-term solution for many safety-critical operations. While unlicensed bands have played an important role in enabling UAS innovation, they are susceptible to interference and may not provide the reliability needed for all mission

types, especially as operations become more complex, more numerous, and more dependent on robust command and control.

The Commission should continue to prioritize implementation of the 5030-5091 MHz band for UAS control links and should seek near-term measures that allow trusted operators to use that band in practical ways while longer-term frameworks are still developing. Public-safety, emergency response, medical logistics, and other critical use cases need a credible bridge between today's interim mechanisms and a mature long-term band plan.

The Commission should also evaluate how different bands can support different functions within an overall UAS architecture. Some missions may depend on highly reliable command and control links, while others may benefit from additional capacity for payload data, surveillance, or supplemental connectivity. The Commission is right to refresh the record on flexible-use terrestrial bands and other candidate frequencies. Oregon encourages the Commission to proceed carefully and pragmatically, with a focus on bounded use cases, technical trials, and interference protection rather than sweeping assumptions. The key question should be which communications tools best support safe operations in specific environments.

In that regard, Oregon encourages the Commission to keep public-interest operations in focus as it evaluates future spectrum access. Wildfire response, emergency management, and rural logistics should not have to wait behind broader commercial debates when those missions can help demonstrate the value of reliable spectrum access under real operational conditions.

IV. The Commission should modernize coordination requirements and reduce procedural friction.

The Public Notice properly asks whether current coordination and notification procedures may be more restrictive than necessary. Oregon believes they often are. Many of the Commission's legacy coordination structures were developed for static, conventional uses and do not always align with mobile, low-altitude, route-based aerial operations.

For UAS operators working in coordination with state and local partners, procedural complexity can become a major barrier. Delays, duplicative reviews, narrow geographic assumptions, and the lack of a predictable process can make it difficult to plan, invest, and execute. This is particularly true when operations involve recurring flights, multiple communications systems, remote or cross-jurisdictional corridors, or public-safety missions that cannot be delayed indefinitely while regulatory uncertainty is resolved.

The Commission should review its coordination and notification requirements with an eye toward enabling more intensive aerial operations where technical showings demonstrate that harmful interference can be avoided. It should consider risk-based approaches, standardized conditions for recurring operations, and pre-coordinated frameworks for approved corridors and testbeds. The Commission should also work closely with the FAA, NTIA, and other federal partners to align expectations and reduce avoidable friction between agencies.

This is not a request to weaken interference protection. It is a request to bring the process into closer alignment with the operational realities of UAS deployment. Effective coordination should be rigorous where needed, but it should also be predictable, timely, and proportional to risk.

V. The Commission should support trusted UAS deployment without undermining continuity of public-service operations.

Oregon recognizes the national security concerns reflected in recent federal actions regarding foreign-produced UAS and UAS critical components. While secure and trusted supply chains matter, public entities need confidence that communications systems and aircraft used for sensitive missions do not create unacceptable risks.

At the same time, the Commission should approach this issue in a way that preserves continuity of public-service operations and gives state and local entities a practical path forward including a simple risk appropriate waiver process. Many public-safety and public-service agencies are navigating a transition environment in which equipment availability, mission continuity, technical maturity, and budget realities all matter. If trusted deployment is to succeed at scale, agencies need clarity, lead time, workable transition pathways, and guidance that is operationally realistic.

Oregon supports efforts to improve visibility into trusted options and to help state, local, tribal, and territorial entities understand the Commission's requirements and related federal processes. If the Commission elects to provide public-safety guidance or publish informational resources regarding trusted UAS, those resources should be clear, current, and coordinated with broader federal policy. They should also distinguish between procurement goals, economic reality, current operational legality, and transition mechanisms so that agencies can plan responsibly.

The Commission should be careful not to frame this issue as if encouragement of domestic or trusted systems alone is sufficient. Trusted deployment also depends on practical access to equipment, certification pathways including coordination with standards development organizations, technical support, and an enabling regulatory environment. Security and operability must move together.

VI. The Commission should establish a central UAS and counter-UAS information resource.

Oregon strongly supports creation of a centralized Commission information resource for UAS and counter-UAS operators. As the Commission notes, the present environment can be difficult to navigate. Operators must often piece together information relating to equipment authorizations, spectrum licensing, waivers, national security requirements, supply chain restrictions, and relevant points of contact across multiple FCC bureaus and proceedings.

A centralized and well-maintained FCC resource would be particularly valuable for state agencies, public-safety entities, airports, infrastructure operators, and emerging public-interest programs that do not have the resources to track every development across the Commission's rules and notices. The resource should be practical and organized around user needs. It should include plain-language explanations of licensing pathways, experimental authorization options, relevant precedents, equipment and supply-chain considerations, coordination requirements, and appropriate Commission contacts. It should also help operators understand how FCC processes relate to broader FAA and interagency frameworks.

This kind of resource would do more than improve convenience. It would reduce friction, improve compliance, accelerate deployment, and make it easier for responsible operators to invest in trusted systems and lawful operations.

VII. The Commission should clarify that counter-UAS testing and air domain awareness can be supported without conflating all issues with mitigation authority.

Oregon appreciates that the Commission is seeking comment on barriers that may affect counter-UAS development and deployment, including whether current limitations under the Communications Act or FCC rules inhibit development. As a threshold matter, Oregon believes the Commission should distinguish clearly among detection, tracking, identification, situational awareness, communications testing, and mitigation. However, Counter-UAS testing, both detection and mitigation, may both be use-cases that could be appropriate for innovation zones.

State and local partners have an increasing need for better air domain awareness, especially around critical infrastructure, airports, emergency incidents, and major public events. Detection and tracking capabilities can also support legitimate aviation uses by improving situational awareness and deconfliction as UAS, AAM, and drone-as-first-responder concepts mature. These functions should not be treated as synonymous with mitigation authority.

The Commission can help by clarifying what communications-related testing and development can proceed under current rules, by modernizing experimental pathways for controlled research and development, and by working with other agencies to ensure that federal policy distinguishes between awareness functions and mitigation actions that may require separate authority. Oregon does not urge the Commission in this filing to expand operational mitigation authority for state or local actors. It does, however, encourage the Commission to remove unnecessary uncertainty that slows the development and lawful testing of technologies that improve awareness, safety, and coordination.

VIII. The Commission should ensure that public-interest and state-led operations remain central in federal spectrum policy.

The Public Notice understandably reflects national security concerns and includes discussion of defense-related testing, trusted supply chains, and federal range development. Those issues are

important. But the Commission should ensure that the record in this proceeding also reflects the needs of civil, public-safety, and state-led operations.

For many communities, the value of UAS is not theoretical. It lies in whether these systems can help detect fires earlier, support responders more effectively, inspect infrastructure more efficiently, deliver critical supplies to remote locations, and improve resilience in places where traditional transportation options are limited. Spectrum policy should be shaped with those uses in mind.

State aviation agencies are well positioned to help the Commission understand those practical needs. They work across agencies, airports, local governments, and operators. They understand where aviation services create public value and what kinds of terrain, operational constraints, and intergovernmental coordination challenges must be addressed to move from demonstration to deployment. Oregon encourages the Commission to engage with state aviation agencies through the National Association of State Aviation Officials (NASAO) as it develops its UAS policies.

Conclusion

The Oregon Department of Aviation appreciates the Commission's attention to the communications and regulatory issues that will shape the future of uncrewed aviation in the United States. The Commission has an important opportunity in this proceeding to remove unnecessary barriers, improve access to spectrum, modernize its licensing and coordination processes, support trusted deployment, and better align its policies with the operational realities of public-interest UAS use.

For Oregon, the central question is whether the federal framework will enable safe, repeatable, and scalable operations in the environments where uncrewed aviation can have the best return on investment. Rural and mountainous terrain, wildfire-prone regions, infrastructure corridors, and medically underserved communities should not be afterthoughts in this conversation. Rather, they should be central to it.

Oregon encourages the Commission to create a more flexible UAS experimental licensing framework, support additional rural and mountainous innovation zones, accelerate practical access to reliable spectrum for safety-critical operations, modernize coordination requirements, provide a centralized information resource, and support trusted deployment in a way that is operationally realistic for state and local public-service missions.

Respectfully submitted,

Kenji Sugahara
Director

Oregon Department of Aviation
3040 25th Street SE
Salem, Oregon 97302