Submission 45 – Tim Tuxworth

The concept of Remote ID for RPAS is ill considered. This proposal makes the assumption that Remote ID shall be done, divorcing it from the "how". It just doesn't make sense to assume Remote ID without knowing how. There are so many potential issues from security, to privacy, to fairness, to legislative overreach that make this problematic.

It also makes no sense to consider RPAS in isolation to other airspace users. This blinkered view of the problem will almost guarantee that the overall problem - how to manage airspace for all users, will not work or will unfairly adversely affect some groups of airspace users to the advantage of others.

As it is this makes a fundamental assumption that drone (and RC plane) flyers are bad actors and must be guilty of something - so they need to be held accountable. Where is the assumption of innocence?

This is a solution in search of a problem. What exactly is the problem that this is trying to solve?