

2022

**State Unpiloted Aircraft System Coordinator and Commercial Drone
Registration Fee Review and Recommendations Report to Legislative
Transportation Committees**

Washington State Department of Transportation

11/17/2022

Introduction

Per SHB 1379 (2021), the following report is provided to the Legislature as a review and for recommendations to the Commercial Unpiloted Aircraft Systems (UAS) Coordinator position and commercial UAS registration program. At the onset, it is important to note the registration program's start date of 1 April 2022. Resulting registration program recommendations are based on seven months of collected data.

I. Executive Summary

The primary purpose of this report is to address the assigned tasks from legislation for the Washington State Department of Transportation (WSDOT) to provide details on the specific activities, accomplishments, and opportunities undertaken by the UAS coordinator, and to review and provide recommendations to the commercial UAS registration fee schedule. The Aviation Division worked within the parameters stipulated in SHB 1379 to collaboratively seek feedback from the Department of Commerce, the Department of Revenue, and industry to provide the recommendations. Consideration was given to the number of unpiloted aircraft systems registered under any single entity, the cost to administer the state UAS Coordinator program, and the number of commercial UAS registered in the state.

II. Activities, Accomplishments, and Opportunities

The work of the UAS coordinator is centered on the collaborative guiding principles stipulated in legislation. Initial and ongoing activities are focused on messaging and the collaborative support of integration strategies with various stakeholders operating in the UAS ecosystem. The following is a review of the activities, accomplishments, and opportunities undertaken by the UAS coordinator:

- Messaging UAS users on regulatory and integration strategy updates from state and federal lines of effort.
 - Newsletter (475 dedicated UAS and aviation subscribers) – Sharing new and significant initiatives, grant opportunities, regulatory changes, and highlights in the UAS ecosystem.
 - Establishment of a UAS website on WSDOT's domain – Providing a forum for resource sharing and communications with the UAS community. The site has successfully provided a platform for citizens, industry, state, and national agencies and organizations to request assistance with matters related to UAS.
- Ongoing collaboration with state and federal organizations in the aviation sector assisting in the development of priorities for the UAS users and statewide ecosystem.
 - Uncrewed Systems Industry Council (Washington State) – Coordinated the effort to consolidate industry priorities of UAS and emerging technology companies in the aviation industry segment to help shape efforts in the expansion of the UAS ecosystem.
 - Washington State Dept. of Commerce/WSDOT.
 - Aviation and Aerospace Advisory Committee/Subcommittee on UAS – Coordinator assisted in the development of Washington's aviation strategic plan within the

III. Justification Statement and State UAS Coordinator Program Recommendations

For the purpose of this report, it is necessary to highlight the role of the state UAS coordinator as an important building block in Washington’s adoption of UAS and AAM technologies. The UAS coordinator role is instrumental in leveraging communications and coordinating activities across the different stakeholders at the state and national level. Since the program’s inception, the coordinator has participated in over 50 separate engagements with the public, industry, and state and federal agencies in advancing the program objectives to further the integration of UAS in Washington. Activities have supported the different stakeholders in topics ranging from the safe use of UAS platforms in the national airspace, to assisting industry in making necessary connections to further commercial applications of the technology to the benefit of Washingtonians.

Recommendations for the program are as follows:

- Retain coordinator position and responsibilities as outlined in the state UAS coordinator bill (SHB 1379). Allowing the program to mature further would provide a more representative assessment period to implement recommendations to the current legislative directive.
- Engage congressional delegation to assist in shaping the current FAA UAS registration program to mirror the crewed aircraft registration system in the sharing of registration data to facilitate outreach to commercial UAS users at the state level. The FAA’s crewed registration database provides registered owner data enabling communications from state agencies to aircraft owners. The current FAA UAS database does not provide the ability to share registered owner data, hampering the ability to conduct outreach to commercial UAS owners.

IV. Commercial UAS Registrations

The Revised Code of Washington 47.68.250 requires every aircraft, to include commercial unpiloted aircraft systems, based or operating in Washington to register with the Department of Transportation for each calendar year; unless exempt from registration under the guidelines of section 6, subparagraph (a)-(h).

For the period starting 1 April 2022 through 27 October 2022, 251 commercial UAS systems were registered under 130 total entities. Of the 130 registered entities, 95 registered a single system, while 35 registered two or more systems. Figure 1 below depicts the entities for which multiple UAS registrations were recorded under a single company.

V. Funds Collected and Cost of Program Administration

The following is a breakdown of collections received from the Commercial UAS Registration program and cost expenditures for the management of the state UAS Coordinator position.

- Funds collected from registration program – \$3,765 (251 registered UAS).
- Program funding for the 2021-23 biennium through legislative proviso within the Aeronautics Account (appropriation 1F0) – \$280,000.

- Projected funding requirement for 2023-25 biennium – \$302,000.
 - \$261,000 A/B labor and benefits.
 - \$ 41,000 E/G/J additional standard costs (including training & work-related travel).

VI. Commercial UAS Program Survey

The Department of Transportation developed and distributed a survey to registered commercial UAS operators, industry partners, and the UAS Newsletter registered recipients. The survey consisted of three questions, formatted to provide the respondents with the ability to submit written recommendations. A total of 49 respondents participated in the survey to some degree. Responses varied from no recommended changes to complete revocation of the program. Detailed survey results are submitted below as Appendix 1 to this report.

VII. Registration Program Recommendations

The recommendations include analysis of the number of commercial UAS registered, distribution of systems through the number of registered entities, cost of administering the program, and feedback provided by industry and the departments as cited in SHB 1379 (2021). The Department also acknowledges the importance of the work necessary to continue to shape the integration and adoption of new technologies into Washington’s aviation system.

The Department recommends the following:

- Retain the Commercial UAS Registration program and its current fee for entities registering a single UAS. The funds currently collected do not cover the expenses associated with the program. However, the relative short duration since the program’s inception and the projected growth in the UAS ecosystem will continue to drive the program towards fiscal equilibrium.
- Add tiered registration fees for entities/companies with multiple UAS registrations. Tiered fees assessed per system registered would lessen the fiscal burden placed on entities with large UAS fleets. A fee reduction of 10% per tier before rounding to the nearest dollar would result in the following recommended fee system:
 - 1 registered UAS under single entity = \$15 per registered UAS/per year.
 - 2 - 10 registered UAS under one entity = \$14 per registered UAS/per year.
 - 11 - 20 registered UAS under one entity = \$12 per registered UAS/per year.
 - 21 - 50 registered UAS under one entity = \$11 per registered UAS/per year.
- Add a cost-cap for entities/companies with large fleets of UAS. Adding a cost-cap for commercial UAS fleets would foster growth in the commercial use of UAS while still contributing to the administration of the program.
 - 51+ registered UAS under one entity = \$10 per registered UAS/ per year.

VIII. Report Summary

Information contained in this report accounts for the relatively short implementation of the state UAS coordinator role, the dynamic and broad UAS ecosystem and integration initiatives, and the lack of

parity with existing information sharing mechanisms such as the Federal Aviation Administration's registration database for crewed vs. uncrewed aircraft systems.

The recommendations provided are preliminary adjustments designed to shape the state UAS coordinator position and the commercial UAS registration fee system. Recommended adjustments to the fees collected through the registration program accommodate initial concerns with the single tiered fee registration program. The total impact of the current registration program is contingent on variables tied to the growth and acceptance of emerging UAS technology for commercial operations within Washington.

Figure 1. Companies/entities with two or more registered UAS



Appendix 1

Washington State Dept. of Transportation Aviation Division Commercial UAS Registration Survey Results

#1

COMPLET

Collector: Web Link 1 (Web Link)
Started: Wednesday, September 07, 2022 8:49:25 AM
Last Modified: Wednesday, September 07, 2022 8:51:19 AM
Time Spent: 00:01:53
146.187.0.119

Page 1

Q1

Does the single tiered fee represent a burden to your company or business? If so, please explain?

No,

If so, please explain?:
Non-profit and schools should have a discounted fee

Q2

Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

Yes,

If yes, please provide a recommendation.:
makes sense to levee fees for more drones, or a fleet, as opposed to a company with a single drone.

Q3

Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

No

#2

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, September 07, 2022 9:07:27 AM
Last Modified: Wednesday, September 07, 2022 9:07:54 AM
Time Spent: 00:00:26
IP Address: 198.238.213.151

Page 1

Q1 **No**
Does the single tiered fee represent a burden to your company or business? If so, please explain?

Q2 **No**
Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

Q3 **No**
Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

#3

COMPLETE

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Started: Wednesday, September 07, 2022 9:30:06 AM
Last Modified: Wednesday, September 07, 2022 9:54:52 AM
Time Spent: 00:24:45
IP Address: 104.28.235.58

Page 1

Q1

Does the single tiered fee represent a burden to your company or business? If so, please explain?

Yes,
If so, please explain?:
B&O tax is paid at the company level.

Q2

Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

Yes,
If yes, please provide a recommendation.:
New and/or small operators rely solely drone operation revenue. Large business or company have multiple streams of revenue.

Q3

Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

Yes,
If so, please explain.:
The FAA requires drone registration. Get the data from the FAA. The revenue collected from this program doesn't benefit or enhance drone operations like Topographic Maps, Obstacle Data, Informational books or pamphlets, website, videos, seminars, trade show presents, and so on. How many registered commercial drone operators are there currently?

#4

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, September 07, 2022 10:26:30 AM
Last Modified: Wednesday, September 07, 2022 10:32:15 AM
Time Spent: 00:05:44
IP Address: 73.19.79.83

Page 1

Q1 **Yes,**
Does the single tiered fee represent a burden to your company or business? If so, please explain?
If so, please explain?:
It's a fee which we're not sure we see any benefit for

Q2 **Yes**
Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

Q3 **Yes,**
Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?
If so, please explain.:
Help drive adoption by different state agencies. We have seen minimal to no RFP's etc. within the State of WA for actual drone service providers. As an example we were one of the (7) or so groups added to the WSDOT CWN (call when needed) approved Drone Vendors list about 4 years ago. We followed up regularly with the State Contact and even met with WSDOT Hwy's group to show them some services. We have yet to ever been called or asked if we could provide any services.

#5

COMPLETE

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Started: Wednesday, September 07, 2022 11:54:33 AM
Last Modified: Wednesday, September 07, 2022 11:56:16 AM
Time Spent: 00:01:42
IP Address: 98.203.130.138

Page 1

Q1

Does the single tiered fee represent a burden to your company or business? If so, please explain?

No

Q2

Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

Yes,

If yes, please provide a recommendation.:
This is just an excuse to extract a few more dollars from already overregulated businesses.

Q3

Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

Yes,

If so, please explain.:
How will this be enforced? Commercial and recreational drone people tend to be a renegade bunch.

#6

COMPLETE

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Last Modified: Wednesday, September 07, 2022 2:06:32 PM
Time Spent: 00:00:20
IP Address: 172.56.105.34

Page 1

Q1 **No**

Does the single tiered fee represent a burden to your company or business? If so, please explain?

Q2 **No**

Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

Q3 **No**

Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

#7

COMPLETE

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Started: Wednesday, September 07, 2022 2:05:58 PM
Last Modified: Wednesday, September 07, 2022 2:06:40 PM
Time Spent: 00:00:41
IP Address: 24.17.230.239

Page 1

Q1 **No**

Does the single tiered fee represent a burden to your company or business? If so, please explain?

Q2 **No**

Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

Q3 **No**

Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

#8

COMPLETE

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Started: Wednesday, September 07, 2022 2:05:59 PM
Last Modified: Wednesday, September 07, 2022 2:08:59 PM
Time Spent: 00:03:00
IP Address: 168.149.139.66

Page 1

Q1 **No**

Does the single tiered fee represent a burden to your company or business? If so, please explain?

Q2 **Yes,**

Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

If yes, please provide a recommendation.:
Single license for the company and all drones work under that license.

Q3 **No**

Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

#9

COMPLETE

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Last Modified: Wednesday, September 07, 2022 2:12:38 PM
Time Spent: 00:00:19
IP Address: 67.160.127.222

Page 1

Q1 **No**

Does the single tiered fee represent a burden to your company or business? If so, please explain?

Q2 **No**

Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

Q3 **No**

Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

#10

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, September 07, 2022 2:09:54 PM
Last Modified: Wednesday, September 07, 2022 2:14:14 PM
Time Spent: 00:04:20
IP Address: 174.215.18.68

Page 1

Q1

Does the single tiered fee represent a burden to your company or business? If so, please explain?

Yes,

If so, please explain?:

\$15.00 annually? Really? The FAA only charges \$5 for 5 years and the actually control things. The state getting involved is completely unwarranted. Money down a bottomless pit. Please take your hand out of my wallet.

Q2

Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

Yes,

If yes, please provide a recommendation.:

The legislature has no business in the UAS business.

Q3

Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

Yes,

If so, please explain.:

End it.

#11

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, September 07, 2022 2:18:57 PM
Last Modified: Wednesday, September 07, 2022 2:19:29 PM
Time Spent: 00:00:32
IP Address: 73.19.4.58

Page 1

Q1 **No**
Does the single tiered fee represent a burden to your company or business? If so, please explain?

Q2 **No**
Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

Q3 **No**
Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

#12

COMPLETE

Collector: Web Link 1 (Web Link)
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Last Modified: Wednesday, September 07, 2022 2:22:01 PM
Time Spent: 00:09:48
IP Address: 73.157.60.139

Page 1

Q1

Does the single tiered fee represent a burden to your company or business? If so, please explain?

No

Q2

Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

Yes,

If yes, please provide a recommendation.:
At \$15 per aircraft, I'm not seeing much of an issue for my organization which uses around 4-7 aircraft at any one time. But I can definitely see a benefit of having an upper limit to the total registration cost for an organization, or maybe some sort of bulk registration fee (e.g. \$100 for every 10 aircraft)

Q3

Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

Yes,

If so, please explain.:
Integration with county and city legislation to make it easier to navigate the legality of flying in a particular area. Example, Seattle currently prohibits remote flight operations from within city parks without a permit. Many cities and counties are unsure about how to establish / enforce / educate their particular drone use requirements. So it would be great to have something at the state-level that requires local jurisdictions to adhere to a standard that can be easily understood and quickly accessed.

#13

COMPLETE

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Last Modified: Wednesday, September 07, 2022 2:29:44 PM
Time Spent: 00:01:24
IP Address: 174.199.51.177

Page 1

Q1

Does the single tiered fee represent a burden to your company or business? If so, please explain?

Yes,

If so, please explain?:

Only the FAA can govern the airspace, therefore th

Q2

Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

Yes,

If yes, please provide a recommendation.:

Only the FAA can govern the airspace, therefore this legislature should be removed as a whole.

Q3

Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

Yes,

If so, please explain.:

Only the FAA can govern the airspace, therefore th

#14

COMPLETE

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Last Modified: Wednesday, September 07, 2022 2:32:07 PM
Time Spent: 00:03:52
IP Address: 50.34.240.162

Page 1

Q1

Does the single tiered fee represent a burden to your company or business? If so, please explain?

Yes,

If so, please explain?:

The fee itself isn't much. But there is also the capacity of staff and the time it takes to do it. Not huge but it's another thing that comes out of our businesses operating costs.

Q2

Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

No

Q3

Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

Yes,

If so, please explain.:

Provide newsletter or emails about the program and work that is being accomplished with the funds. Enforce on those that are choosing to ignore the program.

#15

COMPLETE

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Last Modified: Wednesday, September 07, 2022 2:35:42 PM
Time Spent: 00:04:34
IP Address: 67.189.31.70

Page 1

Q1

Does the single tiered fee represent a burden to your company or business? If so, please explain?

Yes,

If so, please explain?:

As a business, any cost not directly related to providing quality services to my customers is a burden. This includes regulations. Regulations take up time and cost money. They detract from providing services to my customers, they waste my employees time, and eat away at my bottomline. This prevents me from growing my business, providing more value for customers, and hiring more people. This drone fee falls into this category. Each time I purchase a new drone there is now the added cost of the fee and the time it takes to remain in compliance.

Q2

Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

Yes,

If yes, please provide a recommendation.:

Please get rid of all fees, all registration, and the entire website related to it. It costs business money, cost the tax payer money, and provides no value to economy.

Q3

Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

Yes,

If so, please explain.:

Yes, please shut down the program and save the state, taxpayers, businesses, and consumers money. Thank you.

#16

COMPLETE

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Last Modified: Wednesday, September 07, 2022 2:41:26 PM
Time Spent: 00:05:30
IP Address: 75.172.34.181

Page 1

Q1

Does the single tiered fee represent a burden to your company or business? If so, please explain?

Yes,

If so, please explain?:

Because the firm's drones are already required to be registered with the FAA, and operated exclusively under FAA regulatory programs, Washington State's registration fees are redundant and add NO benefit to the public or to the regulated community.

Q2

Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

Yes,

If yes, please provide a recommendation.:

The State of Washington's commercial drone registration program enabling legislation must be repealed for cause.

Q3

Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

Yes,

If so, please explain.:

Rescind the commercial drone registration program and return already-collected registration fees to the UAS owners who have already paid them.

#17

COMPLETE

Collector: Web Link 1 (Web Link)
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Time Spent: 00:01:05
IP Address: 73.225.22.81

Page 1

Q1

No

Does the single tiered fee represent a burden to your company or business? If so, please explain?

Q2

Yes,

Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

If yes, please provide a recommendation.:
It should be by Part 107 operator

Q3

Yes,

Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

If so, please explain.:
Communicate that it's even necessary. I had no idea

#18

COMPLETE

Collector: Web Link 1 (Web Link)
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Last Modified: Wednesday, September 07, 2022 2:43:35 PM
Time Spent: 00:04:21
IP Address: 73.19.60.73

Page 1

Q1

Does the single tiered fee represent a burden to your company or business? If so, please explain?

No,

If so, please explain?:

Not a burden, but doesn't mean it's necessary.

Q2

Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

Yes,

If yes, please provide a recommendation.:

Single or multiple, who cares when it's a camera drone operator?

Q3

Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

No

#19

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, September 07, 2022 2:37:31 PM
Last Modified: Wednesday, September 07, 2022 2:43:44 PM
Time Spent: 00:06:13
IP Address: 174.231.128.225

Page 1

Q1

Does the single tiered fee represent a burden to your company or business? If so, please explain?

No,

If so, please explain?:

If I had more than 1 drone, it might

Q2

Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

Yes,

If yes, please provide a recommendation.:

First drone is one price, additional drones lower price based on total number employed

Q3

Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

Yes,

If so, please explain.:

Cost is a factor. I didn't even know there was an additional state fee besides the FAA registration fee. State fee is currently 9x the FAA registration fee. Lower costs by requiring registration fees for recreational pilots as well.

#20

COMPLETE

Collector: Web Link 1 (Web Link)
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Last Modified: Wednesday, September 07, 2022 2:59:04 PM
Time Spent: 00:02:27
IP Address: 98.97.33.239

Page 1

Q1

Does the single tiered fee represent a burden to your company or business? If so, please explain?

Yes,

If so, please explain?:

Taxation without representation? Lack of transparency. I don't want to pay for something that seems unnecessary

Q2

Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

Yes,

If yes, please provide a recommendation.:

One or multiple... it doesn't seem necessary. FAA handles all this.

Q3

Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

Yes,

If so, please explain.:

Trash it.

#21

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, September 07, 2022 3:19:08 PM
Last Modified: Wednesday, September 07, 2022 3:19:42 PM
Time Spent: 00:00:33
IP Address: 98.97.37.240

Page 1

Q1 **No**

Does the single tiered fee represent a burden to your company or business? If so, please explain?

Q2 **No**

Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

Q3 **No**

Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

#22

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, September 07, 2022 3:39:08 PM
Last Modified: Wednesday, September 07, 2022 3:52:24 PM
Time Spent: 00:13:15
IP Address: 65.132.58.58

Page 1

Q1

No

Does the single tiered fee represent a burden to your company or business? If so, please explain?

Q2

No

Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

Q3

Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

Yes,

If so, please explain.:

Offer a discount for registering multiple years in advance (similar to purchasing web hosting). Some people will like the convenience of paying in advance so they don't have to pay every single year. The benefit to you is that some drones may go out of commission or be sold, and you will get to keep those non-refundable/nontransferable registration fees and possibly also collect fees from the new owner of that drone assuming they will register it. The fee is so nominal that operators likely won't care. I sure don't, and I would definitely pay 2-3 years in advance so I don't have to do it every year.

#23

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, September 07, 2022 4:15:44 PM
Last Modified: Wednesday, September 07, 2022 4:19:56 PM
Time Spent: 00:04:12
IP Address: 104.29.46.18

Page 1

Q1

Does the single tiered fee represent a burden to your company or business? If so, please explain?

Yes,

If so, please explain?:

I can't keep the lights on as a FAA Certified UAS pilot. I work in Tech full-time and now have to freelance any UAS. Any fees, when just trying to remain legal is a burden.

Q2

Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

Yes,

If yes, please provide a recommendation.:

There is already a federal UAS licensed pilot database. There is ZERO reason to add additional financial burdens or tracking off pilots at a State level. This is borderline illegal. UAS is Federally overnighted.

Q3

Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

Yes,

If so, please explain.:

abolish it. Leverage the FAA database and use their APIs to look up existing pilots and their currency of licensing. There is zero reason registration belongs at a state level

#24

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, September 07, 2022 4:57:40 PM
Last Modified: Wednesday, September 07, 2022 4:57:57 PM
Time Spent: 00:00:16
IP Address: 24.56.250.82

Page 1

Q1 **No**

Does the single tiered fee represent a burden to your company or business? If so, please explain?

Q2 **Respondent skipped this question**

Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

Q3 **Respondent skipped this question**

Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

#25

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, September 07, 2022 5:09:25 PM
Last Modified: Wednesday, September 07, 2022 5:11:25 PM
Time Spent: 00:01:59
IP Address: 66.235.6.102

Page 1

Q1 **No**

Does the single tiered fee represent a burden to your company or business? If so, please explain?

Q2 **No**

Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

Q3 **No**

Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

#26

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, September 07, 2022 7:12:04 PM
Last Modified: Wednesday, September 07, 2022 7:13:54 PM
Time Spent: 00:01:50
IP Address: 75.169.159.162

Page 1

Q1

Does the single tiered fee represent a burden to your company or business? If so, please explain?

Yes,

If so, please explain?:

Why is there a yearly registration requirement? That's simply another cost.

Q2

Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

Yes

Q3

Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

Yes,

If so, please explain.:

End the WA state registration program! The program is simply a way for WA raise revenue.

#27

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, September 07, 2022 7:27:33 PM
Last Modified: Wednesday, September 07, 2022 7:32:09 PM
Time Spent: 00:04:36
IP Address: 50.46.193.171

Page 1

Q1

Does the single tiered fee represent a burden to your company or business? If so, please explain?

No

Q2

Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

Yes,

If yes, please provide a recommendation.:
allow proof if FAA registration to suffice for state registration.

Q3

Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

Yes,

If so, please explain.:
WSDOT should lead ongoing safety training with lessons learned from incidents in WA and provide a clearinghouse of all the drone laws specific to WA

#28

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, September 07, 2022 8:14:01 PM
Last Modified: Wednesday, September 07, 2022 8:15:40 PM
Time Spent: 00:01:38
IP Address: 71.227.145.244

Page 1

Q1

Does the single tiered fee represent a burden to your company or business? If so, please explain?

Yes,
If so, please explain?:
The purpose of state registration in addition to federal requirements eludes me.

Q2

Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

Yes

Q3

Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

Yes,
If so, please explain.:
End it. It serves no purpose.

#29

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, September 07, 2022 9:35:25 PM
Last Modified: Wednesday, September 07, 2022 9:37:19 PM
Time Spent: 00:01:53
IP Address: 73.11.134.50

Page 1

Q1

Does the single tiered fee represent a burden to your company or business? If so, please explain?

Yes,

If so, please explain?:
Federal fees plus test fees plus training

Q2

Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

Yes,

If yes, please provide a recommendation.:
Match federal fees \$5 evrry 3 years.

Q3

Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

No,

If so, please explain.:
Enhance what? You provide no service or benefit. You just take\$15 bc Washington.

#30

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, September 07, 2022 11:29:24 PM
Last Modified: Wednesday, September 07, 2022 11:37:42 PM
Time Spent: 00:08:18
IP Address: 98.97.112.9

Page 1

Q1 **No**

Does the single tiered fee represent a burden to your company or business? If so, please explain?

Q2 **No**

Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

Q3 **Yes,**
If so, please explain.:
Provide avenues/incentives/opportunities for participation in DoT projects.

Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

#31

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, September 08, 2022 8:27:10 AM
Last Modified: Thursday, September 08, 2022 8:29:36 AM
Time Spent: 00:02:26
IP Address: 170.39.242.113

Page 1

Q1

No

Does the single tiered fee represent a burden to your company or business? If so, please explain?

Q2

No

Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

Q3

Yes,

Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

If so, please explain.:

There should be a clearer distinction between "commercial" and "Part 107". Part 107 is everything that is not hobby, and there are more reasons than commercial activity to need a Part 107. Your program coordinator was very helpful in explaining this to me that WA registration is just for when you are making money. But this wasn't clear on the website.

#32

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, September 08, 2022 8:47:18 AM
Last Modified: Thursday, September 08, 2022 8:47:48 AM
Time Spent: 00:00:30
IP Address: 73.53.21.116

Page 1

Q1 **No**
Does the single tiered fee represent a burden to your company or business? If so, please explain?

Q2 **No**
Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

Q3 **No**
Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

#33

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, September 08, 2022 9:22:32 AM
Last Modified: Thursday, September 08, 2022 9:22:54 AM
Time Spent: 00:00:22
IP Address: 73.140.143.80

Page 1

Q1 **No**

Does the single tiered fee represent a burden to your company or business? If so, please explain?

Q2 **No**

Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

Q3 **No**

Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

#34

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, September 08, 2022 12:13:51 PM
Last Modified: Thursday, September 08, 2022 12:19:40 PM
Time Spent: 00:05:49
IP Address: 65.152.54.50

Page 1

Q1

Does the single tiered fee represent a burden to your company or business? If so, please explain?

Yes,

If so, please explain?:

Because you are charging an arbitrary fee that only serves you.

Q2

Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

Yes,

If yes, please provide a recommendation.:

There should be no fee charged.

Q3

Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

Yes,

If so, please explain.:

Yes. No registration required. No fee required.

#35

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, September 09, 2022 6:42:32 AM
Last Modified: Friday, September 09, 2022 6:46:55 AM
Time Spent: 00:04:22
IP Address: 66.119.199.42

Page 1

Q1

Does the single tiered fee represent a burden to your company or business? If so, please explain?

Yes,

If so, please explain?:

For the level/size drone I have, the fee is extremely higher than the FAA fee of \$5 for three years.

Q2

Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

Yes,

If yes, please provide a recommendation.:

For drones that are over 55lbs, the current rate could apply.

For drones less than 55lbs, adopt the FAA rate.

Q3

Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

Yes,

If so, please explain.:

Lower the fee for the smaller drones that are used for survey and photography.

#36

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, September 09, 2022 11:55:54 AM
Last Modified: Friday, September 09, 2022 11:57:08 AM
Time Spent: 00:01:13
IP Address: 73.254.91.88

Page 1

Q1

Does the single tiered fee represent a burden to your company or business? If so, please explain?

Yes,
If so, please explain?:
It's already handled at the federal level

Q2

Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

Yes,
If yes, please provide a recommendation.:
Cancel it

Q3

Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

Yes,
If so, please explain.:
Stay out of federal airspace

#37

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, September 09, 2022 11:56:16 AM
Last Modified: Friday, September 09, 2022 11:57:38 AM
Time Spent: 00:01:22
IP Address: 50.46.250.203

Page 1

Q1

No

Does the single tiered fee represent a burden to your company or business? If so, please explain?

Q2

Yes,

Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

If yes, please provide a recommendation.:
The burden to fund these programs shouldn't rest equally on a single person business as they do on a much larger business. Maybe it doesn't need to be per drone, but 1-5 drones or 20+ drones, etc.

Q3

No

Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

#38

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, September 09, 2022 1:49:12 PM
Last Modified: Friday, September 09, 2022 1:51:31 PM
Time Spent: 00:02:19
IP Address: 97.126.93.160

Page 1

Q1

Does the single tiered fee represent a burden to your company or business? If so, please explain?

Yes,

If so, please explain?:

Already taxed by FAA for federal airspace.

Q2

Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

Yes,

If yes, please provide a recommendation.:

Should not require a fee for small businesses or businesses with less than 10 drones

Q3

Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

Yes,

If so, please explain.:

Get rid of it! It provides no value to me. Washington does not regulate the national airspace.

#39

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, September 09, 2022 12:59:49 PM
Last Modified: Friday, September 09, 2022 1:52:48 PM
Time Spent: 00:52:59
IP Address: 107.115.33.1

Page 1

Q1

Does the single tiered fee represent a burden to your company or business? If so, please explain?

Yes,

If so, please explain?:

As a single person trying to start a small business involving the use of drones, this just builds the paywall higher. Being in the drone community I've seen the phrase, "this will hurt innovation" more times than I can count, but in a lot of cases this is true. Of course we are going to see innovation from large businesses who can manage these fees without a problem, but what about the flip side of that coin? What about the small business that has no choice but to be innovative because otherwise they can't compete? These people have no choice but to be leaders in innovation because they lack the massive funding of their large competitors. To then add the need to give out more money, will indeed hurt innovation. Speaking to just my personal experience, I have paid for all of my equipment out of my own pocket, as well as the training for the part 107 (roughly \$400 for both training and testing minus the day off work needed to test), I already have to pay \$5 per drone to the federal government (I have 5 drones I expect to regularly use that = \$25), not including the cost of the state and local business licencing, and then the new addition of a \$15 per drone local registration fee (now making my 5 drones cost \$20 each to be fully registered to = another \$100 for registration alone). This building of the entry paywall to start a business like this and do it LEGALLY will make sure that only already existing companies or those who can get loans/grants can enter. If we as a state want to be competitive in this field we need to do better at supporting our small businesses by removing this kind of paywall.

Q2

Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

Yes,

If yes, please provide a recommendation.:

It is common place that if you purchase more you can pay less. We see this all the time in bulk purchasing. At a minimum, the cost per drone should be lowered. However, as a single person trying to build my business out of pocket, \$15 a drone is too much. I have a family that takes priority of the start of my business. That money is better spend on school supplies for my kids than on registration of drones that I've already paid once to register with the federal government. Let's start taking cost off the registration of drones when more than one or two drones are being registered.

Q3

Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

Yes,

If so, please explain.:

I think more needs to be taken into consideration when applying fees. As a single person starting a small business \$15 per drone is too much. However, for Amazon or Google that might not be enough. This has a direct correlation to how we manage taxes. The top 1% pay almost nothing while being the top earners and the rest of us pick up the slack. It's time to start letting these huge businesses pickup their fair share so the rest of us have a fighting chance in these markets. I also think it's fair to give all (including large businesses) a break though when registering several drones at a time. That way no one feels like they are being singles out. We small businesses can enter the market a little easier while also saying to large existing businesses that we will give you a break because you are registering possibly 100's of drones.

#40

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, September 09, 2022 2:22:43 PM
Last Modified: Friday, September 09, 2022 2:25:17 PM
Time Spent: 00:02:33
IP Address: 73.118.182.77

Page 1

Q1

Does the single tiered fee represent a burden to your company or business? If so, please explain?

Yes,

If so, please explain?:

A few per drone??! WTF. The drones are already registered with the FAA. This is a no value add money grab.

Q2

Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

Yes,

If yes, please provide a recommendation.:

The program is a money grab that likely can't support itself and provides zero value to anyone. Get rid of it.

Q3

Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

Yes,

If so, please explain.:

Get rid of it

#41

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, September 09, 2022 5:11:35 PM
Last Modified: Friday, September 09, 2022 5:13:36 PM
Time Spent: 00:02:00
IP Address: 68.186.20.7

Page 1

Q1

Does the single tiered fee represent a burden to your company or business? If so, please explain?

No

Q2

Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

Yes,

If yes, please provide a recommendation.:
Maybe a fee for a business with multiple drones that is reduced. A small workforce can't fly them all at once, and myself I have a backup drone.

Q3

Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

Yes,

If so, please explain.:
Eliminate it altogether.

#42

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Saturday, September 10, 2022 7:30:13 AM
Last Modified: Saturday, September 10, 2022 7:31:30 AM
Time Spent: 00:01:16
IP Address: 76.178.176.224

Page 1

Q1

No

Does the single tiered fee represent a burden to your company or business? If so, please explain?

Q2

No

Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

Q3

Yes,

Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

If so, please explain.:

Try to link state registration with FAA. So it's one step instead of two separate steps. Easier for businesses. Especially if they have multiple drones

#43

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Sunday, September 11, 2022 8:13:04 AM
Last Modified: Sunday, September 11, 2022 8:17:12 AM
Time Spent: 00:04:07
IP Address: 172.223.234.146

Page 1

Q1

Does the single tiered fee represent a burden to your company or business? If so, please explain?

Yes,

If so, please explain?:

Triple the amount of federal registration. Prohibitive for small business operators.

Q2

Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

Yes,

If yes, please provide a recommendation.:

\$5 registration fees. 1 time registration fee. Single \$15 registration fee for UAS small business operators

Q3

Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

No

#44

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Sunday, September 11, 2022 12:07:15 PM
Last Modified: Sunday, September 11, 2022 12:09:14 PM
Time Spent: 00:01:59
IP Address: 172.56.153.73

Page 1

Q1

No

Does the single tiered fee represent a burden to your company or business? If so, please explain?

Q2

No

Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

Q3

Yes,

Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

If so, please explain.:

Let the FAA run commercial drone ops and quit trying to make money.

#45

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Sunday, September 11, 2022 7:58:00 PM
Last Modified: Sunday, September 11, 2022 8:00:07 PM
Time Spent: 00:02:07
IP Address: 73.254.73.45

Page 1

Q1

Does the single tiered fee represent a burden to your company or business? If so, please explain?

Yes,
If so, please explain?:
I don't see any value in it.

Q2

Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

Yes,
If yes, please provide a recommendation.:
Get rid of it. It does nothing useful.

Q3

Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

Yes,
If so, please explain.:
End it!

#46

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, September 12, 2022 2:49:34 PM
Last Modified: Monday, September 12, 2022 2:51:08 PM
Time Spent: 00:01:34
IP Address: 152.44.214.34

Page 1

Q1 **No**

Does the single tiered fee represent a burden to your company or business? If so, please explain?

Q2 **No**

Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

Q3 **No**

Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

#47

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, September 14, 2022 9:00:34 AM
Last Modified: Wednesday, September 14, 2022 9:20:11 AM
Time Spent: 00:19:37
IP Address: 198.181.18.22

Page 1

Q1

Does the single tiered fee represent a burden to your company or business? If so, please explain?

Yes,

If so, please explain?:

The system poses an unnecessary administrative burden on WA businesses and residents, and was not well executed in an area of industry already challenged with following local, state and federal requirements. In 5 years of commercial drone operation, the WSDOT has provide no support that would substantiate what appears to be a tax, which is 3x higher than the federal requirement.

Q2

Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

Yes,

If yes, please provide a recommendation.:

Federal drone laws already require registration and that information is publicly available - USE IT FIRST!

Q3

Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

Yes,

If so, please explain.:

Use the already available federal data and stop creating additional administrative burdens for businesses operating in Washington. Do not make a complicated and evolving system more complicated. The rollout of this 'plan' was not well executed - why wasn't this announced more broadly? Our company has several commercial drone pilots, is based out of Washington and an employee happened to find out about this new "fee" while reviewing a private aviation blog that mentioned it long after the April 1st deadline.

#48

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, September 15, 2022 11:13:52 AM
Last Modified: Thursday, September 15, 2022 11:14:29 AM
Time Spent: 00:00:37
IP Address: 198.238.213.154

Page 1

Q1 **No**

Does the single tiered fee represent a burden to your company or business? If so, please explain?

Q2 **Yes**

Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

Q3 **No**

Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

#49

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, September 26, 2022 10:42:22 PM
Last Modified: Monday, September 26, 2022 11:00:51 PM
Time Spent: 00:18:28
IP Address: 67.5.126.71

Page 1

Q1

Does the single tiered fee represent a burden to your company or business? If so, please explain?

Yes,

If so, please explain?:

As a drone service provider for construction I usually have a plethora of different UAS at my disposal and if I were to have 10, 20,30 or more of varying size and capability the cost become ridiculous. another note is that a micro drone and a drone that's just under 55lbs costs the same and considering smaller drones are easier to obtain that fixed price goes up unrepresentative of the unit.

Q2

Should the Legislature consider revisions to the current commercial drone registration fee program for businesses or companies that employ multiple drones? If yes, please provide a recommendation.

Yes,

If yes, please provide a recommendation.:

if yes maybe tier smaller drones and larger drones differently. Also with the way the law is written I don't see any benefit to SUAS company's and company's using UAS to be solely taxed upon this. If the primary issue is to have the DOT have and integrate there own UAS operations that should be a tax given to the people of the state to run a state funded program..

Q3

Do you have a recommendation as to how the Department of Transportation could enhance the current commercial drone registration program?

Yes,

If so, please explain.:

Clearly communicate the benefit of this and enforce it. Consider the writing of the law there where very few areas where this registration was beneficial to anyone but DOT. We already have federal registrations and many other state have found that sufficient. If the benefit is not communicated clearly or enforced then what's the point to pay it. And if it is going to be enforced are 107 regulations going to be properly enforced and upheld by DOT considering The UAS will be operating in state airspace? If Commercial operators have to pay to play there should be more benefit in integration to the state operations as a whole.
