



COALITION FOR
Reimagined Mobility

Transportation Policy that Puts People First



SAFE

October 18, 2024

Keri L. Lyons,
Manager, Office of Airports Emerging Entrants Division
Federal Aviation Administration
800 Independence Ave. SW
Washington, DC 20591

FR Doc: 2024-20915, *Engineering Brief No. 105A, Vertiport Design*

To Whom It May Concern:

The Coalition for Reimagined Mobility (ReMo), a global initiative of the organization SAFE, commends the Federal Aviation Administration (FAA) for its ongoing efforts to update design standards of vertiports for aircraft with vertical takeoff and landing (VTOL) capabilities in the draft Engineering Brief (EB) 105A. With the rapid evolution of VTOL aircraft, establishing clear and forward-thinking design standards is essential for the safe and efficient integration of these low and zero-emission technologies into the national airspace.¹

The United States has played a pivotal role in shaping the past and future of the Advanced Air Mobility (AAM) sector, building on its long-standing leadership in the aviation sector. However, as other nations rapidly advance their AAM capabilities and invest in supporting infrastructure and regulatory frameworks, the U.S. must act to maintain, and in some cases reclaim, our position as the global leader in this industry. Earlier this year, ReMo published its flagship report, [*Unlocking a 21st Century Mobility System: How to Rethink the Future of Mobility and Restore Leadership in Transportation Innovation*](#), which emphasized the urgent need to create and accelerate new policy frameworks to facilitate a reimagined mobility future and ensure the U.S. remains both globally competitive and secure.

ReMo commends the FAA for its proactive engagement with industry stakeholders in the development of EB 105A - despite the tight timeline to finalize the design guidelines by the end of 2024 and publish a performance-based vertiport design Advisory Circular (AC) by 2025, with the goal of unifying heliport and vertiport guidelines. While we fully support the development

¹ Note: ReMo brings together industry CEOs, public sector leaders and practitioners across transportation, technology, and sustainability to advance public policy and real-world solutions to improve the movement of people and goods worldwide. The Coalition is part of SAFE, a bipartisan, nonprofit accelerating the real-world deployment of secure, resilient, and sustainable transportation and energy solutions that enhance the country's economic and energy security. For more information, visit <https://reimaginedmobility.org/>

and implementation of EB 105A and acknowledge the FAA's eventual goal for a unified vertical-lift infrastructure standard, we urge the FAA to expedite this single document guidance to ensure the industry benefits from clear standards and that the U.S. can remain competitive in this rapidly advancing sector.

As outlined in our comments, vertiport design guidelines should consider the following:

- **Multimodal integration** - vertiports should seamlessly connect VTOL aircraft with other transportation modes like ridesharing, micromobility and public transit to enhance efficiency and reduce congestion.
- **Standardizing charging infrastructure** - promote adaptable charging infrastructure while pushing for standardization to prevent fragmentation, similar to the electric vehicle (EV) industry's move from the Combined Charging System (CCS) to North American Charging System (NACS) standard.
- **Balancing design for present and future aircraft** – publicly funded vertiports should be designed to accommodate a range of VTOL models to promote market competition and operational flexibility while ensuring that facilities aren't overly customized for specific manufacturers.
- **Guidelines for short and long-term parking** - provide clear standards for short- and long-term parking by considering operational patterns like VTOL size and duration of stay, to ensure efficient space management of valuable real estate.
- **Futureproofing for emerging technologies** - include guidelines for different energy sources, such as hydrogen, to ensure vertiports are adaptable to future technologies, much like California's hydrogen and electric vehicle network expansion.

Our goal in submitting these comments is to support the FAA in refining EB 105A to ensure it meets the needs of both consumers and industry. We hope our input will help inform the FAA's decisions in crafting standards that foster a secure, competitive, and innovative environment for VTOL operations in the U.S. We look forward to continuing to work with the FAA and other stakeholders to support the development of safe and efficient vertiport infrastructure.

We would welcome the opportunity to answer any questions about these comments or discuss them with officials from the FAA. If you have any questions or wish to discuss further, please contact Avery Ash at aash@secureenergy.org.



Avery Ash
Executive Director, Coalition for Reimagined Mobility
Senior Vice President for Government Relations and Special Initiatives, SAFE