

UNIVERSITY OF CALIFORNIA

UNMANNED AIRCRAFT SYSTEM POLICY

Policy Guidance Document

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UNMANNED AIRCRAFT SYSTEM
SAFETY

Abstract

The UC Center of Excellence on Unmanned Aircraft System (UAS) Safety provides the following non-binding guidance to assist in the implementation of the Presidential Unmanned Aircraft System Policy (Policy), including the management of UAS activity at University Locations and the development of location-specific policies or procedures regarding the use of UAS at University Locations.

The guidance is intended to 1) elaborate on the current regulatory environment and compliance requirements, 2) describe suitable means of compliance with the Policy and 3) provide example language that may be used in location-specific policy or procedure or in communication.

To the extent of any inconsistencies between the minimum requirements set in Policy or this guidance document and any applicable regulation, the regulatory requirements govern.

This document is expected to continue to be revised and updated regularly as a result of regulatory changes, improvements to safety best practices and user feedback.

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Version History

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2018/01/26	1	New Document

1 The Presidential UAS Policy

The purpose of the Policy on UAS is to establish minimum standards for the safe use and operation of UAS and Small Unmanned Aircraft System (sUAS), including Drones and Model Aircraft, on any University Location or for any University Business. The Policy requires that all UAS operations are performed in a manner that mitigates risk to safety, security and privacy, and ensures compliance with any applicable regulation. A copy of the text of the Policy can be found in Section 22.

The scope of the policy includes

- The operation of any Unmanned Aircraft (UA) owned by the University of California (UC).
- The operation of any UA at or within the property owned or managed by the UC.
- The operation of any UA used for University Business.

The Policy is summarized as below

- Establishes a Systemwide Designated UAS Authority.
- Establishes the development of a UAS Advisory Board.
- Establishes that Executive Officer may appoint a Designated Local Authority.
- Establishes that Executive Officer may authorize the development and implementation of location-specific policies or procedures at any University Location within the Executive Officer's jurisdiction.
- Anyone who seeks to operate a UAS must:
 - Comply with any applicable regulation
 - Have prior approval from a Designated Local Authority or Systemwide Designated UAS Authority
 - Operate in a manner that ensures public safety, right to privacy, civil rights and civil liberties.
 - Maintain sufficient liability insurance coverage.
- All UAS activity under this Policy must be documented and reported.
- All UC-owned UAS must be properly registered to the UC and submitted to the Designated Local Authority or Systemwide Designated UAS Authority.
- Registration documents for UAS used for University Business must be submitted to the Designated Local Authority or Systemwide Designated UAS Authority.
- All UAS activity must have aviation liability coverage.
- All UAS activity in foreign nations or by foreign nationals must follow export control regulations and the UC Export Control Policy.

1.1 Role of the Presidential UAS Policy

The use of UAS is very nuanced across the wide diversity of use and few static generalizations regarding standards are appropriate. The Policy is intended to be flexible and adaptive to a wide range of needs.

It is not intended for direct implementation for end-users, rather it is intended for University Locations to aid in the oversight and management of UAS by setting uniform minimum compliance standards and in the establishment of a Systemwide Designated UAS Authority to provide services at the end-user level, department level, campus level and system level.

The value of the Policy is in the structure of the management of UAS activity. By establishing a common process and listing out roles and responsibilities, the Policy provides the UC system with:

- Access to UAS subject matter experts.
- Clarity on UAS related regulations.
- Ability to share best practices across campuses.
- Transparency and accountability on UAS activity.
- Transparency and accountability on UAS activity request reviews.

1.2 Role of the Systemwide Designated Authority

The role of the Systemwide Designated UAS Authority is defined as

- Provides interpretation of UAS regulations.
- Develops internal University policies on certification and flight safety training.
- Reviewing and approving applications for operation of UAS on University Locations and at University Business.
- Maintains a record of all UAS activity within the scope of the Policy.
- Ensures Policy compliance with applicable laws and regulations.
- Tracks and manages the University response to pending and upcoming UAS legislation, regulations, policies and guidances.

1.3 Role of the UAS Advisory Board

The UAS Advisory Board is responsible for:

- Reviewing exemptions from the Policy.
- Assisting in the development of systemwide UAS policies.
- Reviewing and commenting on proposed policies and long-term goals.
- Evaluating the effectiveness of systemwide UAS policies and safety metrics.
- Ensuring that systemwide UAS policies remain consistent with applicable privacy best practices (See Section 21).

Upon the finalization of Policy, the UAS Advisory Board will be filled. Active areas of discussion for the UAS Advisory Board are anticipated to include:

- Recreational Model Aircraft use.

- Proposed UAS regulations on UAS activity above non-participating persons.
- Proposed UAS regulations related to UAS delivery services.

1.4 UAS Activity not included in the Scope of the Draft Systemwide Policy

UAS activity not covered within the scope of the Policy:

- Personally-owned UA not used at a University Location
- Personally-owned UA used as Model Aircraft for education (See Section 10.2) and not used at a University Location
- Student club-owned UA not used at a University Location

The use of UAS by Emergency First Responders may additionally be exempt as necessary. However, any use of UAS by Emergency First Responders must follow their internal department protocols.

1.5 Relation of UC Systemwide UAS Policy with Existing UCOP Policies

All efforts have been made to ensure that the Policy is congruent with existing University of California, Office of the President (UCOP) policies.

Examples of congruence with existing UCOP policies

- UAS registration has precedent with BFB-BUS-19: Registration and Licensing of University-Owned Vehicles
- BFB-BUS-29: Management and Control of University Equipment requires that all motor vehicles, aircraft and watercraft shall be registered on behalf of the University by the designated University location representative and the designated University location representative ensures governmental compliance.
- BFB-BUS-81: Insurance Programs establishes that the University purchases aviation insurance to provide coverage for liabilities arising from the University's aviation operations that result in bodily injury and/or property damage.
- PACAOS-14: Definitions establishes common definitions used in PACAOS policies, including definitions of 'Campus', 'Property' and 'University'.
- PACAOS-30: Policy on Speech and Advocacy establishes that the University is committed to assuring that all persons may exercise their constitutional rights.
- PACAOS-40: Policy on Use of University Properties establishes the policy on the use of University properties that provides the basis for oversight
- PACAOS-40.00 establishes that university property must be used only in accordance with federal, state and local laws.
- PACAOS-40.40 establishes that all persons may exercise constitutionally protected rights of free expression, speech, assembly and worship.
- PACAOS-42.40 allows campuses to adopt restrictions on the use of University Property for commercial purposes and personal financial gain

- UC's policy on the Management of Health, Safety and the Environment states that all University Activities are to be conducted in a manner than ensures the protection of students, faculty, staff, visitors, the public, property and the environment.

2 Campus or Medical Center Authority

Campus and Medical Center Executive Officers (or their designees) may elect to appoint a Designated Local Authority and authorizing the development and implementation of University Location specific UAS policies and procedures.

As many University Location have experienced, UAS activity is diverse. UAs have been documented within the UC system:

- Engineering coursework – Indoors and Outdoors
- On-campus UAS research flights
- Fieldwork at UC Natural Reserve Sites
- Fieldwork on private property
- At UC Division of Agriculture and Natural Resources (UC ANR) Research and Education Centers
- Drone Clubs and student recreation
- Campus Media and Strategic Communications
- Facility Management and Construction Monitoring
- 3rd Party Contractors
- 3rd Party Film Crews

Even within similar purposes and locations, different risk factors may lead to drastically different risk scoring. It is strongly recommended that University Locations develop location-specific policies or procedures that can scale appropriately.

2.1 Location-Specific Policy

Each Campus and Medical Center is encouraged to develop a location-specific policy to address local issues.

A location-specific policy or procedure may include but is not limited to addressing the following questions:

- Who approves flights for the location?
- Will departments or subgroups have the autonomy to approve flights with consultation from the Designated Local Authority?
- Who should be notified regarding on-campus UAS activity?
- What are the terms of approval?
- Who has priority to operate a UAS?
- Specific areas where UAS activity is prohibited
- Availability of areas where UAS activity may be operated recreationally

- How long an approval may be valid?
- Enforcement of UAS policies
- Creation of a UAS committee or working group to advise local policies
- Procedures regarding the purchase of a UAS
- Standards regarding privacy

A Campus or Medical Center may elect to not develop a location-specific policy, in which the Systemwide Designated UAS Authority may review and approve UAS activity on a case-by-case basis.

2.2 Designated Local Authority

The Designated Local Authority is a local authority that serves as a single point of contact for UAS activity for a University Location. This single point of contact serves as a means to funnel UAS requests across the diversity of uses and departments that may use or employ UAS.

The responsibilities of a Designated Local Authority may additionally be delegated and shared across multiple departments as long as there remains a focal point for coordination and records.

3 Background on UAS Regulations

There are a range of UAS-related regulations that may be applicable in any given UAS activity. Different regulations may apply based on

- Purpose of UAS activity
- Location of UAS activity
- Ownership of UA

A determination of which regulations are applicable is a component of the UAS activity review as described in Section 5.

The UC is held liable for all UAS activity by UC-owned UA and UAS activity for University Business. Federal law states that it is illegal to hire an aircraft operator if that operator does not have the correct airman's certificate (49 United States Code (U.S.C.) 46306(b)(8)). Additionally, the owner of an aircraft may be held liable if an aircraft is knowingly operated illegally (FAA Order No. 96-17).

3.1 Federal Aviation Administration Regulations

Most Federal Aviation Administration (FAA) regulations that will be relevant are found within Title 14 of the Code of Federal Regulations (CFR), Part 107 - SMALL UNMANNED AIRCRAFT SYSTEMS. This set of regulations are specific for sUAS and introduces a new FAA-issued Remote Pilot Certificate for the operation of sUAS. A summary and compliance list for 14 CFR 107 can be found in Section 15.1.

Regulations regarding the registration of sUAS are found within 14 CFR 48. For UA above 55 lbs (total take-off weight) must be registered under the regulations described in 14 CFR 47. Under 14 CFR 48, sUAS must be registered with individual registration numbers, while Model Aircraft may be registered as a group under the owner of the Model Aircraft.

The use of Model Aircraft is regulated under 14 CFR 101 - MOORED BALLOONS, KITES, AMATEUR ROCKETS, UNMANNED FREE BALLOONS, AND CERTAIN MODEL AIRCRAFT. The definition of Model Aircraft is defined in Section 336 of Public Law 112-95.

UA and UAS activity that does not meet the definition of Model Aircraft is by default, considered civil UAS activity and is subject to FAA regulations, such as 14 CFR 107 and 14 CFR 48.

3.2 United States Code

Additional regulations may be found in Title 49 of the U.S.C., Title 49 - TRANSPORTATION, Subtitle VII - Aviation Programs. Relevant statutes include legal definitions in 49 U.S.C. § 40102. Additional regulations regarding registration may be found in 49 U.S.C. 44103. Federal aviation criminal statutes are found in 49 U.S.C. § 46307.

3.3 State and Local Regulations

In addition to federal regulations, many states, counties and municipalities are also drafting relevant UAS regulations. While the FAA has jurisdiction over the National Airspace System (NAS), other powers may issue regulations. From the FAA, 'laws traditionally related to state and local police power - including land use, zoning, privacy, trespass, and law enforcement operations - generally are not subject to Federal Regulations.' Example regulations have included zoning restrictions on when and where UAS may take off or land, or extra penalties for the use of UAS in the invasion of privacy.

3.4 International UAS regulations

Outside of the US, many countries have also adopted UAS regulations with varying levels of restrictions. Currently, there is no reciprocity between the US and any other country's UAS regulations. There is no blanket allowance of a US certification in another country and the FAA does not recognize any other country's UAS license. Regulations abroad are also changing rapidly and currently require regular review prior to UAS activity.

3.5 Jurisdiction of the University of California

The UC has legal standing to implement regulations, policies, or procedures of activity on University Location. This includes defining where aircraft may be launched or land, and whether persons standing on a University Location may or may not operate equipment or machinery. The UC has legal standing to implement regulations, policies or procedures for the use of any UA owned by the UC.

The UC does not have legal standing to implement regulations, policies or procedures regarding overflight of UC property as this remains the jurisdiction of the FAA. The UC may not enforce a general prohibition of any aircraft from flying above a University Location.

However, other non-aviation regulations may be violated during an overflight of a University Location and may be enforceable by law enforcement. As an example, the invasion of privacy is under state jurisdiction and within the state of California, 'a person is liable for physical invasion of privacy when the person knowingly enters onto the land or into the airspace above the land of another person without permission or otherwise commits a trespass in order to capture any type of visual image, sound recording, or other physical impression of the plaintiff engaging in a private, personal or familial activity and the invasion occurs in a manner that is offensive to a reasonable person.'¹. Other laws, such as trespass and nuisance, may also be applicable during an overflight of a University Location.

¹CA Civil Code 1708.8(a)

4 Registration of UAS

Within the US, all UA must be registered under the regulations specified by 14 CFR 47 or 14 CFR 48, depending on the weight of the aircraft, location of the aircraft's operation or primary purpose of the aircraft. Aircraft flown exclusively outside the US or within military airspace may be subject to other registration requirements.

4.1 Registration of UC-owned UAS

The Regents of the University of California are the legal owners of all UC property. Similarly to BFB-BUS-19: Registration and Licensing of University-Owned Vehicles, all UC-owned UA must be registered to the Regents of the University of California (Figure 4.1) to meet compliance obligations under 14 CFR 47 or 14 CFR 48.



Figure 4.1: Example sUAS Registration Certificate

Registration under 14 CFR 48 may be done online (Figure 4.2) at <https://faadronezone.faa.gov/>.

UAS that weigh more than 55 lbs or are required to have UAS registration that is valid internationally must be registered under 14 CFR 47 and must be done through mail with an Original Aircraft Registration Form, AC Form 8050-1.

4.2 Registration of Model Aircraft

Model Aircraft are required to be registered under 14 CFR 48. Though typically most UA owned by the UC will be registered individually, there are some cases where they may be registered as Model Aircraft.

UA that are used exclusively as Model Aircraft may be registered as a group under the owner of the Model Aircraft. In the case of the group or company owned Model Aircraft, they may be registered under the primary user or manager of the Model Aircraft as the Model Aircraft registration is not considered proof of ownership.

Common scenarios for Model Aircraft

- Model Aircraft owned by students should be registered by the student

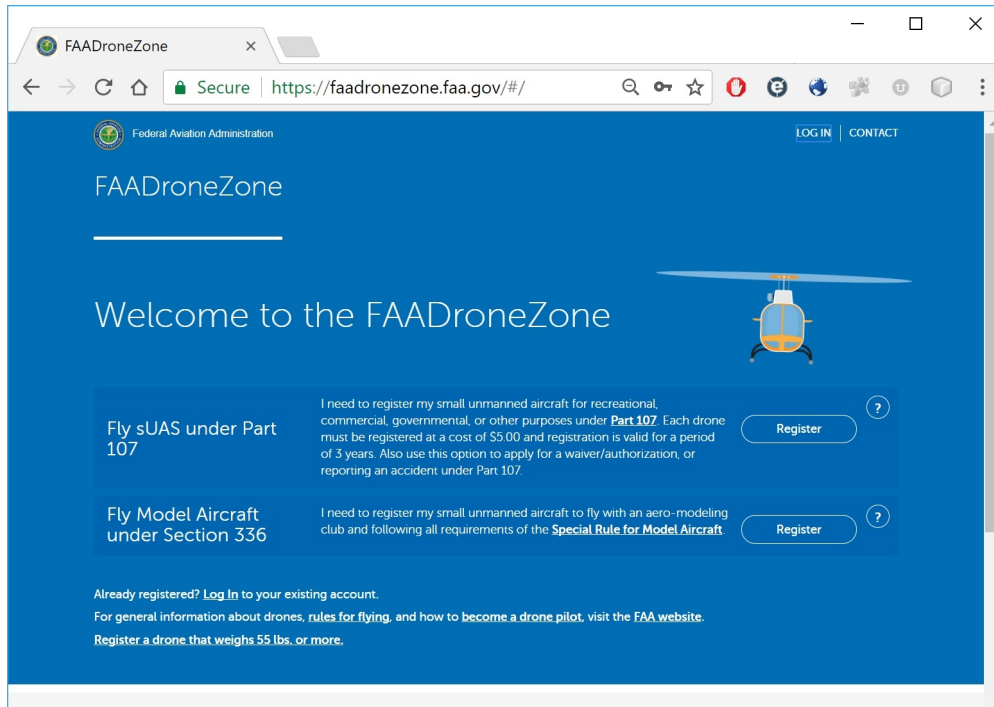


Figure 4.2: FAA sUAS Registration Site

- Model Aircraft owned by a student club can be registered by a member of the student club, a club mentor or faculty advisor.
- Model Aircraft used in classroom or educational activity should have the faculty, instructor or department staff member register for an FAA registration number to be placed on all aircraft.

4.3 Record Keeping Policy Requirements

Records of UC-owned UAS registration must be provided to the Designated Local Authority or the Systemwide Designated UAS Authority. Registration of all UA used for University Business must be provided to the Designated Local Authority or the Systemwide Designated UAS Authority. UC Drones may be used to submit records electronically and other electronic submission processes may be available in the future. A University Location may additionally implement a centralized registration process using a single FAA online account.

5 Review of UAS Activity

5.1 General Procedures

A UAS activity Request process provides the University of California the ability to validate whether the proposed use complies with the Policy that requires all operations are performed in a manner that mitigates risks to safety, security, privacy and ensures compliance with any applicable regulation. All persons seeking to operate a UAS covered within the Policy must submit a UAS Request Form to the Designated Local Authority or Systemwide Designated UAS Authority if a Designated Local Authority has not been appointed for a University Location.

The Policy requires that the review of a proposed operation must be responded to within two weeks.

Approvals for UAS activity may be granted in many forms:

- Single or set of UAS flights during a specific time-window
- Set of UAS flights over a defined period of time
- Scheduled recurrent UAS flights at a defined location
- Unscheduled UAS usage at a series of predefined locations
- Standing approvals

Records of approval and the terms of the approval must be kept by the Designated Local Authority and the Systemwide Designated UAS Authority.

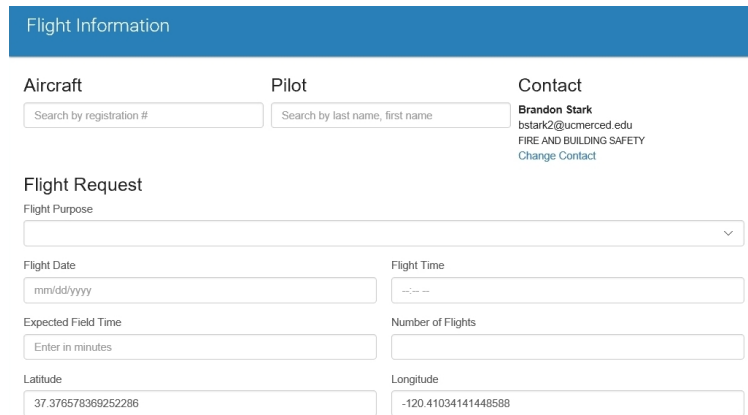
5.2 Submission of UAS Request Form

The UAS Request Form is a documented request of UAS activity. An example form can be made available by a Designated Local Authority or Systemwide Designated UAS Authority (Figure 5.1). The Policy does not mandate a specific form or system for submitting a UAS Request Form. A University Location may establish a specialized UAS Request Form for any UAS activity as long as the UAS Request Form collects sufficient information to conduct a review of the UAS activity to ensure Policy compliance (Figure 5.2).

5.3 Reviewer of UAS Activity

The Policy grants authority to review UAS activity to the Systemwide Designated UAS Authority and the Designated Local Authority. Per the Policy, the Systemwide Designated UAS Authority may review UAS activity unless a Designated Local Authority is assigned to review UAS activity at a Campus. In many cases, the Designated Local Authority is in a better position to evaluate the safety and impacts to privacy of UAS activity on their location.

As per the relationship between the Systemwide Designated UAS Authority and Designated Local Authority, the Systemwide Designated UAS Authority will provide interpretation of regulations, including international, federal, state and local, and provide subject matter expertise to the Designated Local Authority to pass the final judgment. It is expected that as campuses become more familiar with UAS



Flight Information

Aircraft
Search by registration #

Pilot
Search by last name, first name

Contact
Brandon Stark
bstark2@ucmerced.edu
FIRE AND BUILDING SAFETY
Change Contact

Flight Request

Flight Purpose

Flight Date
mm/dd/yyyy

Flight Time

Expected Field Time
Enter in minutes

Number of Flights

Latitude
37.376578369252286

Longitude
-120.41034141448588

Figure 5.1: Example UAS Flight Request Form - UC Drones

regulations and their use, the majority of use cases may be handled completely by the Designated Local Authority.

A location-specific policy or procedure may further establish the role of the Designated Local Authority and other campus entities that may be granted autonomy to review UAS activity.

5.4 Criteria Used to Evaluate UAS Activity

The Policy mandates that all UAS activity within the scope of the policy must be approved prior to flight. The review process must include:

- Review of compliance with applicable regulations (Section 5.4.1) and includes Export Control (Section 5.4.2).
- Review of impacts to safety (Section 5.4.3).
- Review of impacts to privacy, civil rights and liberties (Section 5.4.4).
- Review of insurance (Section 5.4.5).

The review process may additionally include

- Prioritization of University Business
- Approval of facility manager or other local authority
- Approval or consent of persons that may be impacted by the proposed operation
- Previous documented flight experience or expertise
- Impacts to wildlife or other environmental concerns

5.4.1 Evaluation of Regulatory Compliance

UAS regulations are regularly evolving; there are multiple legal pathways within the US and internationally. The Policy does not mandate exclusive compliance with a particular set of regulations. The

Figure 5.2: Example UAS Flight Request Form - UC San Diego

Systemwide Designated UAS Authority is responsible for providing the interpretation to regulations for the Designated Local Authorities.

Civil Regulations for Small Unmanned Aircraft Systems (14 CFR 107)

As of January 26, 2018, more than 2/3rds of UAS activity within the UC system falls under the recently released regulations in 14 CFR 107. The full language of the regulations can be found here: https://www.faa.gov/uas/media/RIN_2120-AJ60_Clean_Signed.pdf and a summary can be found here: https://www.faa.gov/uas/media/Part_107_Summary.pdf. There are 22 points of compliance as outlined in the 14 CFR 107 compliance list found in Section 15.1. If further regulations are issued that provide alternative legal pathways, they may be utilized without requiring modification to policy.

Model Aircraft (14 CFR 101)

UAS activity for coursework, senior projects or recreation may be eligible for compliance through the Model Aircraft regulations in 14 CFR 101. Information on the interpretation of student use can be found in Section 14. The full language of the regulations can be found here: <https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=14:2.0.1.3.15>. There are 8 points of compliance as outline in the Model Aircraft Regulation compliance list (Section 15.2).

Public Agency Operations (14 CFR 91)

UAS activity may be conducted under 14 CFR 91 regulations when classified as a Public Agency Operation (PAO) with a Public Aircraft. UAS activity requested as an PAO should be reviewed on a case-by-case basis as these authorizations are often specific to an aircraft, location, purpose and organization, and may contain special restrictions or allowances. The Systemwide Designated UAS Authority is available to review and issue an interpretation for compliance.

Section 333 Exemptions (14 CFR 91)

UAS activity may be conducted under 14 CFR 91 regulations through a special exemption known as

Section 333 Exemption (Section 333 of Public Law 112-95, see Section 14)). Operations conducted through Section 333 exemptions should be reviewed on a case-by-case basis as these authorizations contain different restrictions and allowances, depending on use case.

International Regulations

UAS activity conducted outside of the US are subject to the host country's regulations. The Systemwide Designated UAS Authority maintains a database of international UAS regulations and will provide an interpretation of regulations as requested.

State or Local Regulations

Many states and cities have begun to implement local authority over UAS activity. There is currently no central database of such regulations, so these must be identified and reviewed on a case-by-case basis. The Systemwide Designated UAS Authority maintains a database of common state and local regulations requested by UC UAS activity.

5.4.2 Evaluation of Compliance with Export Control

Certain UAS may be export controlled under US Export Regulations and, as such, may not be physically exported outside the United States without a license from the US government. In addition, a license may be required if foreign nationals located within the US are provided access to the technology related to such systems (deemed exports). All UC individuals or organizations that intend to design, build, research, use in research, modify, dismantle, and/or operate a UAS in foreign countries and/or with foreign nationals in the US or abroad must do so in accordance with the Export regulations and the UC Export Control Policy. Documentation of UC-owned unmanned aircraft is additionally available for Export Control personnel to review.

5.4.3 Evaluation of Impacts with Safety

The review of the UAS activity is limited to the scope of campus or public safety. It does not review all safety implications.

As applicable, the Designated Local Authority or Systemwide Designated UAS Authority should review for

- Mitigation strategies for
 - Pedestrian Safety
 - Vehicular Safety
 - Loss of Control
- Crowd Control
- Sensitive Locations

Not all UAS activity will require a detailed review for minor or low risk activity. A primary means of mitigation for safety impacts is to relocate UAS activity to large, open areas away from non-participating persons.

The review of safety does not absolve the Remote Pilot in Command (RPIC)'s responsibility to maintain a safe operating environment. The safety aspect of the review does not consider:

- Weather conditions
- Obstructions from ground hazards (Trees, temporary structures)
- Previous unrecorded flight experience

5.4.4 Evaluation of Impacts with Privacy, Civil Rights and Liberties

The use of UAS is still relatively new and there is still much trepidation regarding privacy, civil rights, liberties and UAS. Compliant with other UC policies regarding privacy, UAS activity must respect the privacy of others and not infringe on their civil rights and liberties.

The perceived invasion of privacy is additionally to be avoided. It is unlikely that a proponent would blatantly propose activity that would invade a person's privacy. However, there may be proposed activity that may be perceived as potentially invading privacy. An example of this would be in UAS activity in close proximity to residential buildings. Regardless of the intent or business nature of the UAS activity, unless mitigating strategies are employed, such activities should be prohibited. Best practices regarding UAS activity are listed in Section 21.

5.4.5 Evaluation of Compliance with Insurance

All UAS activity must be covered by liability insurance. The UC provides automatic coverage for UAS activity for UC-owned UA. Additionally, personally owned UA used for University Business can be covered if the UAS activity is approved.

All 3rd Party UAS activity must submit appropriate insurance, including a written agreement which indemnifies and holds the University harmless from any resulting claims or harm to individuals and damage to University property.

A proponent of Model Aircraft for Recreation may show affiliation with a Nationwide Community-Based Organization that has an approved set of safety guidelines.

More details are provided in Section 8.

5.5 Other Factors that may be reviewed

At a minimum, the above criteria are necessary to be reviewed. However, there may be other factors that may be utilized at the discretion of a Designated Local Authority in accordance with a location-specific policy or procedure. This may include but is not limited to:

- Prioritization of University Business.
- Risk Level of UAS activity.
- Approval of facility manager or other local authority.
- Approval or consent of persons that may be impacted by the proposed operation.
- Previous documented flight experience or expertise.
- Impacts to wildlife or other environmental concerns.

There are currently only limited existing standards for UAS activity that may or may not be applicable within the UC system. A location-specific policy or procedure may elect to adopt standards as they are developed. It is intended that the Systemwide Designated UAS Authority will continue to evaluate and provide recommendations for specific standards.

5.6 Relationship of a UC Review Process with Applicable Regulations

The University of California requires that all UAS activity comply with all applicable regulations, at the international, federal, state and local levels, as well as mitigates risks to safety, security and privacy. Additionally, a Designated Local Authority may choose to review other factors.

It is foreseeable that otherwise legal UAS activity may be prohibited or require modification by either the Designated Local Authority or Systemwide Designated UAS Authority.

Example of potential scenarios:

- Non-essential UAS activity in the vicinity of dorms where privacy concerns exist.
- UAS activity where the use of a UAS would disrupt other University Business such as commencement ceremonies or campus events.
- Proposed UAS activity that conflict with other previously approved UAS activity.
- Proposed UAS activity that is likely to violate FAA regulations such as direct flyovers of large areas of a busy campus.
- Proposed UAS activity requires the reservation of an athletics field that is occupied.
- Proposed UAS activity is above a preferred flight altitude limit for a specific location and may interfere with medical helicopter activity.

The review by a Designated Local Authority or Systemwide Designated UAS Authority also includes state or local regulations at sites such as California State Parks or County Park Systems. A UAS activity may be considered legal under FAA regulations, but may be prohibited by other regulations, and thus would not be approved. Due to the vast diversity of regulations at the state and local level, a review process may take longer at those sites.

5.7 Terms of Approval

In some cases, UAS activity approval may require additional terms or conditions. These may arise from UAS activity where additional flexibility is requested, such as recurrent UAS activity in a low-risk location. The Designated Local Authority or Systemwide Designated UAS Authority may attach additional requirements or procedures at their discretion.

Items to consider as part of the Terms of Approval

- Frequency of reporting.
- Currency requirements of the RPIC.
- Procedures to address rescheduling.
- Procedures for accident notification.

Example language that may be used in Terms of Approval can be found in Section 20.

6 UAS Activity Reporting

The reporting of UAS activity is an important aspect of oversight, management and the development of future policies and procedures. The Policy mandates that reporting must be accomplished but does not specify details regarding the frequency or specific information requirements. This section provides guidance on establishing a successful reporting system.

All reporting must meet or exceed compliance with all applicable regulations and policies. As of January 26, 2018, the UC has 3 UAS specific reporting compliance obligations. The UC additionally has other reporting compliance obligations related to workplace safety and accident reporting.

6.1 UAS Compliance Obligations

- All UAS activity covered under the UC's UAS insurance must be reported to the insurance broker on a quarterly basis.
- All UAS activity classified as a PAO must be reported to the FAA on a monthly basis.
- Records of UAS activity conducted under 14 CFR 107 may be requested by the FAA and must be made available.

6.2 UAS Safety Metric Tracking

An important aspect of regular UAS activity reporting is the tracking of safety metrics. Through the use of effective data collection, trends regarding UAS safety enables Designated Local Authorities to identify and make recommendations to adjust local procedures without compromising safety.

Flight record statistics may also be utilized for reviews for high risk UAS activity. Example scenarios include standing approval for media representatives who must maintain Currency for UAS activity that require a higher level of expertise due to a higher Risk Level.

6.3 Collection of UAS Activity Reports

The Policy does not mandate a specific process for collection of UAS activity. A Designated Local Authority or location-specific policy or procedure may opt to implement a different solution, depending on need or desired data. It is recommended that UAS activity reports be collected as immediately as possible from the proponent to minimize complacency and forgotten minor incidents.

Example UAS activity Report Collection

- UC Drones on a per day, per aircraft, per pilot basis.
- Excel spreadsheet of reports collected on a weekly basis.
- Webform generated report.
- Electronic submission via access to a commercial cloud solution.
- Scanned handwritten documents.

UC Drones provides Designated Local Authorities with a mechanism to collect and review UAS activity reports (See Section 11.1). Data entered in UC Drones may be made available to authorized personnel in compliance with UC policies.

6.4 UC Minimum Reporting Guidance

Flight record data must include

- Date
- Pilot
- Aircraft
- Location
- # of flights
- Total flight time
- Accident or incident records

Flight records may additionally include

- Flight altitude or distance
- Telemetry data
- Fuel or Battery information
- Software/hardware configurations, including payload
- Weather conditions
- Images or other media of the UAS activity

6.5 3rd Party Reporting

UAS activity accomplished by a 3rd Party must be tracked and monitored. Failure to submit records may be considered in future UAS activity review.

6.6 Alternative Means of Compliance

In some use cases, it may be unfeasible to collect accurate flight record information.

Example scenarios:

- Indoor Activity
- Individual Recreational Model Aircraft
- Coursework with large groups of students

In these cases, the location-specific policy or procedure or Designated Local Authority, in consultation with the Systemwide Designated UAS Authority and or the UAS Advisory Board may develop alternative means of compliance. Example solutions include low fidelity usage approximations on a daily or monthly summary.

7 UAS Accident Reporting

All UAS accidents, incidents and malfunctions must be reported. This differs from FAA requirements under 14 CFR 107 because the UC has other reporting compliance obligations that it must meet. A Designated Local Authority or the Systemwide Designated UAS Authority will make a determination if the accident, incident or malfunction requires further reporting with the appropriate regulatory body.

In data collected from July 2016 to July 2017, the majority of UAS accidents, incidents or malfunctions that resulted in non-minor UAS damage, injury or property damage were caused by human-factors.

7.1 Common Accidents, Incidents or Malfunctions

Some of common UAS accidents, incidents and malfunctions that have been reported include:

- Operator error resulting in collision with stationary object
- Loss of Battery/Fuel
- Fly-away/loss of control
- Hardware malfunctions such as GPS interference
- Improper 'Return to Launch' location
- Improper assembly of vehicle
- Experimental hardware/software
- Hazardous weather conditions
- Battery caught fire from puncture or impact

7.2 Exemptions

The following accidents, incidents and malfunctions are exempt from reporting

- Malfunctions related to payloads that have no impact on safety
- Damage of components designed or expected to fail during regular use
- Rough or hard landings that do not result in damage
- Damage to the drone due to improper ground-handling/transportation

7.3 Accident Investigation

The Designated Local Authority or Systemwide Designated UAS Authority may initiate an investigation of a reported accident, incident, malfunction or reported near-miss situation. Any opportunity to better understand the root cause of a UAS accident is valuable. A process or procedure for accident investigation may be written into a location-specific policy or procedure. Below are some general guidelines for conducting a UAS Accident Investigation (adapted from OSHA).

7.3.1 Incident Investigation Principles

- Do not assign blame to the reporter
- Remind everyone that the investigation is to learn and prevent, not to penalize
- Ensure everyone's narrative is heard

7.3.2 Process

- Call or gather the necessary persons to conduct the investigation
- Identify and gather witnesses (if applicable)
- Collect facts
- Collect a narrative from the RPIC and witnesses
- Document the incident with photos and videos (if applicable)
- Complete a report (if applicable)
 - Identify causes
 - Identify latent conditions
 - Identify corrective actions

7.3.3 Interviewing People

- Use open-ended questions
- State the purpose of the investigation is fact-finding, not fault-finding
- Ask the individual to recount their version of the event
- Ask clarifying questions to fill missing information
- Ask the individual what they think could have prevented the incident, focusing on the conditions and events preceding the event.

7.3.4 Information to Collect

- RPIC information
- UAS information, including
 - Hardware or Software firmware
 - Automated features of the UA used
- Time of Day
- Location
- Potential visual obstructions, including

- Trees,
- Powerlines,
- People or crowds,
- Weather conditions, such as
 - Wind
 - Sun location
 - Clouds or Fog
- Supervisor information
- Potential witnesses
- Corrective actions
- Causal factors that may have played a role

7.3.5 Determining Causal Factors

Causal factors for an accident are rarely definitive and may be subjective. Some example causal factors to investigate include, but are not limited to:

- Was there external pressures that may have contributed to the incident, such as weather, pressure from management, time-limits, etc?
- Was the location a contributing factor?
- Was the management or oversight procedures a contributing factor?
 - Consider administrative or engineering factors
- Was equipment questionable but still used?
- Was there a miscommunication within the operating team?
- Were there any quick fixes/unplanned changes made in the field to complete the mission?

8 UAS Insurance

8.1 Coverage for UC-owned Unmanned Aircraft

The University of California (UC) has purchased an UA Liability Policy. This policy has a total of \$5 Mil limit with a \$1 Mil Personal Injury sublimit and \$1 Mil Products/Completed Operations sublimit.

Coverage is automatic for UAS activity that meet the following criteria:

- Flight operations are conducted on behalf and sanctioned by the University of California.
- Aircraft weight under 55 lbs (at time of takeoff)
- Flight operations are within Visual Line of Sight (VLOS)
- Flight operations are below 400 ft above ground level.
- Flight operations must be conducted within the United States.

Any UAS activity that do not meet the above criteria or operate outside the above criteria must be reported to and approved by the insurance underwriter in order to be covered.

Any UAS activity that is not approved by a Designated Local Authority or Systemwide Designated UAS Authority is not covered by this liability insurance coverage.

8.2 Coverage for Personally Owned Unmanned Aircraft Used for University Business

The University of California (UC) has extended their UAS liability policy to enable coverage of UAS owned by UC students, staff or faculty used for University Business, including research. Coverage is contingent on compliance with the policy and procedures on UAS usage. This coverage is not intended to cover student organizations or 3rd Party vendors or contractors.

8.3 Recommended Minimums for 3rd Party

All 3rd Party UAS activity, including on behalf of the University or other users of campus space, must have liability insurance with a preferred limit of \$5 Mil. In addition to the limit that is provided by the RPIC, a certificate of insurance along with a copy of the endorsement listing the following insurance clauses should be issued prior to commencement of services:

1. Name The University and its directors, officers, employees, servants and agents (collectively, the "Indemnified Parties" and individually, the "Indemnified Party") as additional insureds, as their respective interests may appear
2. The RPIC's insurance shall be primary without any right of contribution from any other insurance available to The University
3. Include a cross liability or severability of interests among Indemnified Parties, providing that the insurance shall operate in all respects as if a separate policy had been issued covering each party insured
4. Include a waiver of subrogation in favor of the Indemnified Parties.

5. The certificate of insurance shall also provide that, in the event of a cancellation or material restrictive change of the policy which would adversely affect the interest of the Indemnified Parties, the insurers agree to provide 30 days prior written notice to The University.

9 UAS Safety Guidelines

Safety is a moving target rather than a static definition. As technology and regulations change, different interpretations of how to achieve a safe operating environment evolve. What follows below are general guidelines to how UAS safety may be reviewed. The Systemwide Designated UAS Authority is additionally available to review.

Disclaimer: Not all UAS safety risks are capable to be reviewed. **The review of UAS safety does not absolve an RPIC's responsibility to ensure a safe operating environment.**

9.1 UAS Safety

UAS safety typically falls under two categories: (1) Planned Safety and (2) On-site threats. The UAS activity review process includes a review of Planned Safety to ensure that the RPIC is aware of potential risks and has procedures to mitigate risks.

Not all potential safety considerations may be applicable. Many risks associated with UAS activity can be mitigated by selecting operating locations where a UAS incident or accident would be unlikely to cause an injury.

9.1.1 Planned Safety

Planning for safety is an important aspect to UAS activity. Many RPICs have documented standard operating procedures that may be used to fulfill safety planning requirements.

Depending on the scenario, safety planning may include:

- Narrative of the proposed operation
- Flight altitudes
- Marking of buffer or safe-zones
- Specific flight paths
- Emergency procedures
- Identified emergency or contingency locations
- Crew management (including roles and responsibilities)
- Procedures to manage crowds or spectators

9.1.2 On-site Threats

There are many on-site threats to UAS safety that are not always feasible to be reviewed. It is the responsibility of the RPIC to ensure a safe operating environment, from ensuring the UA is suitable for operation to managing intrusions and weather conditions.

Example On-site Threats

- Weather conditions
- Structures not visible from satellite imagery, such as
 - Powerlines or telephone poles
 - Recent construction
 - Temporary structures
- Intruding air traffic
- Intruding pedestrians or other non-participants
- UA damage
- Unplanned spectators or crowds

9.2 Safety Guidelines

- UAS activity should always establish a buffer or safe-zone between the UA and any non-participating persons or sensitive locations.
- A good rule-of-thumb is to maintain a buffer or safe-zone of roughly $\frac{1}{4}^{th}$ of the flight altitude.
- Visual Observers (VOs) and supporting ground crew should be utilized when available
- Supporting ground crew should assist in ensuring safety to all non-participating persons.
- High visibility reflective vests should be utilized when operating near roads or when near non-participants (Figure 9.1)
- Whistles are effective for alerts or other time-sensitive communication
- Orange cones may be used to help communicate UA flight regions to non-participating persons, but are not fully sufficient.
- If spectators are expected, a supporting ground crew member should be tasked with preventing spectators from distracting the RPIC with questions or comments.
- When operating in uncontrolled locations in proximity to non-participating persons, extra care should be exercised. Specific flight paths and altitudes should be pre-planned such that potential gaps in buffer or safe-zones can be identified.
- When operating near roads, a supporting ground crew member should be tasked with being located near the road to monitor traffic, and if necessary, retrieve a fallen UA before it becomes a road hazard.
- When operating in fenced areas, operate exclusively within the fenced areas unless there is sufficient visibility on the other side to ensure safety to non-participants.
- Flying above buildings and structures minimizes risk to pedestrians, but it is recommended to contact the facility manager to explain the proposed operation and potential for risk.



Figure 9.1: UAS operators with high visibility reflective vests

9.3 Aerial Threats to UAS Activity

One of the biggest UAS safety concerns for the FAA is aircraft to aircraft strikes. As of January 26, 2018, there has been one validated accident between a UAS and manned aircraft. However, there have been many documented near-misses, even within the UC system.

Detecting and avoiding aircraft is a four-stage process: detect, assess, decide, act. Each stage takes a non-insignificant amount of time.

Minimize the threat of aerial collisions by making sure you have enough time to get out of the way.

- Minimize the time it takes to detect a threat.
 - Constantly listen for potential incoming aircraft.
 - Bring a visual observer.
 - Everyone must be on task while the UAS is in operation. Minimize idle chat.
- Minimize the time it takes to assess a threat
 - Fly at low-altitudes and within close proximity to make it easier to judge whether an intruding aircraft may pose a threat.
 - Practice judging an intruding aircraft's location by sound.
 - Use visual scanning techniques to identify an aircraft's location quicker.
- Minimize the time it takes to decide on a course of action.

- Pre-plan for evasive actions by identifying evasive action trajectories.
- Know where emergency safe landing locations are.
- Minimize the time it takes to act.
 - Know how to disengage an automated flight plan.
 - Practice taking over and resolving an aerial threat.

9.4 UAS and Fire Safety

While UAS accidents and incidents involving fire are rare, they are a valid and significant concern. With the majority of UC UAS usage on field sites and other rural locations, the potential for the accidental sparking of fire is a concern. A fire sparked by a UAS can spread quickly (Figure 9.2) and with California's dry environment, can cause significant damage (Figure 9.3).



Figure 9.2: Beginning of a fire at Richmond Field Station, UC Berkeley



Figure 9.3: Post fire damage from UAS accident at Richmond Field Station, UC Berkeley

The most common cause of UAS related fire is from misuse of Lithium Polymer (LiPo) batteries. Special care should be taken when charging, discharging or storing LiPo batteries. If the internal polymer cell of a LiPo battery is exposed to air, a violent chemical reaction starts that could explode, but more commonly releases significant amounts of smoke and heat that can ignite other fire fuel sources. A LiPo battery fire is typically caused by a physical puncture to the battery or from misuse, such as overcharging or electrical shorts.

In reviewing UAS activity, it is important that the RPIC is aware of the relevant fire dangers and plans for fire safety. Consult the appropriate department (Fire, Field Safety, EH&S) if there are concerns over fire risk. Minimize the potential for fire by monitoring where the UAS will be flying and ensure that if a fire was to occur, the RPIC and any other persons, such as VOs, are prepared to respond appropriately.

Guidance for fire safety:

- Everyone should take a fire safety training course.
- Avoid flying on high fire risk days.
- Bring a fire extinguisher and a shovel/bucket of sand to field sites.
- Ensure that a crew member has easy access to fire equipment.
- Ensure that a crew member has easy access to reach any location where the UA may crash.
- When flying in high fire risk locations, use high quality, commercially available UA with enclosed electronics.
- Never fly a damaged or swollen battery.

9.5 Community Input to Safety

Another pathway that is recommended to improving UAS safety is to acknowledge the demand for UAS activity and engaging with the campus community to ensure there is a functional pathway to meet the demand. When the pathway is too restrictive, non-compliance increases and in turn decreases overall safety. The following list are recommendations to help engage the campus community to ensure the implementation of policy meets their needs.

1. Develop working groups to provide UAS service or training opportunities
2. Establish procedures and locations for regular low risk UAS activity
3. Identify and make public low risk locations for UAS activity
4. Hold UAS related events to provide networking and community building
5. Develop community-based guidelines for safety training and operations

10 Special Consideration Use Cases

10.1 Recreational Model Aircraft

Model Aircrafts have been a popular past-time since the dawn of modern aviation, and their use has largely been unregulated. In 2012, Congress put into law the definition of Model Aircraft and the Special Rule for Model Aircraft in Public Law 112-95 (Section 14). The Special Rule was codified in 14 CFR 101 with the publication of 14 CFR 107. A summary of the definition of Model Aircraft and the Special Rule for Model Aircraft can be found in Section 15.2.

While operating under Model Aircraft regulations, the RPIC is not required to have a Remote Pilot Certificate. However, they are required to register the Model Aircraft with the FAA, notify all airports and heliports within 5 statute miles and adhere to a community-based set of safety guidelines and within the programming of a Nationwide Community-Based Organization. As of January 26, 2018, there is no standard definition for Nationwide Community-Based Organization. It is universally accepted that the Academy of Model Aeronautics (AMA) qualifies as a Nationwide Community-Based Organization. The AMA is the world's largest model aviation association and is open to anyone interested in model aviation. It has a well-established Safety Code (abridged in Section 15.2.4).

Model Aircraft activity can be made safe and appropriate in large, open fields with limited opportunities for pedestrian intrusion. However, safety considerations arise when operating in small areas, or in the vicinity of people. It is important to note that under the AMA safety code, Model Aircraft must remain a minimum of 25 ft from all persons, with the exception of the RPIC.

The use of Model Aircraft is within the scope of the Policy to review. This enables the location-specific policy or procedure or Designated Local Authority to issue restrictions or allowances on Model Aircraft at University Locations. This includes open or standing approvals in specific activities that are deemed to be of low or minor risk.

Other example Model Aircraft policies or procedures statements:

- Model Aircraft activity is prohibited within 100 ft of residential areas without prior approval.
- Model Aircraft activity is allowed at specific campus fields for any UC-affiliate who completes an online webinar that instructs on campus-specific policies and safety guidance.
- A student club that wished to hold a Model Aircraft club activity must submit safety documentation.
- Model Aircraft activity may not exceed 100 ft Above Ground Level (AGL).

It is recommended that the policies or procedures for Model Aircraft include consultation with expected users and include student groups.

10.2 Educational Use

As of January 26, 2018, there are specific educational use cases of UAS that fall under Model Aircraft regulations as outlined in the FAA's interpretation memo: https://www.faa.gov/uas/resources/uas_regulations_policy/media/Interpretation-Educational-Use-of-UAS.pdf

The FAA states that:

- A person may operate an UA for Hobby or Recreation in accordance with Section 336 of the FAA Modernization and Reform Act (See Section 14) at educational institutions and community-sponsored events provided that person is
 - not compensated
 - any compensation received is neither directly nor incidentally related to that person's operation of the UA at such events;
- A student may conduct Model Aircraft operations in accordance with Section 336 of the FAA Modernization and Reform Act (See Section 14) in furtherance of his or her aviation-related education at an accredited educational institution.
- Faculty teaching aviation-related courses at accredited educational institutions may assist students who are operating a Model Aircraft under Section 336 and in connection with a course that requires such operations, provided the student maintains operational control of the Model Aircraft such that the faculty member's manipulation of the Model Aircraft's controls is incidental and secondary to the student's (e.g., the faculty member steps-in to regain control in the event the student begins to lose control, to terminate the flight, etc.).
- The prohibition on receiving compensation, while broad, does not preclude a student from operating UAS in connection with fulfilling a specific course's requirement while also receiving financial aid, participating in work-study programs or being a paid research assistant to a faculty member teaching such a course.

This is interpreted as follows:

- A student may operate under Model Aircraft regulations (Section 15.2) when its use is part of a course such as
 - an in-class assignment
 - a homework assignment,
 - a class-project, or
 - a senior-project.
- A student may operate under Model Aircraft regulations (Section 15.2) while being paid or financially compensated by the University as long as the compensation is not related to the operation of the UA.
- A faculty member may operate under Model Aircraft regulations (Section 15.2) when providing only secondary control to a student operating under Model Aircraft regulations (Section 15.2).
- A faculty member is not subject to the above restriction when operating under sUAS regulations as defined under 14 CFR 107 (Section 15.1).
- Research projects that are sponsored, directed or developed by faculty, research staff, or paid students including graduate students may not be conducted under Model Aircraft regulations (Section 15.2)
- A club or other community-based group may operate under Model Aircraft regulations (Section 15.2) at University Locations provided they are:

- not compensated
- any compensation received is neither directly nor incidentally related to that person's operation of the UA at such events;
- A student club may organize a club event on a University Location under Model Aircraft regulations.
- A student who operates a Model Aircraft for a homework assignment or class project may use the footage or data collected at a later date for non-recreational purposes.

10.2.1 UC-owned Unmanned Aircraft used in Education

If the UA is owned by the UC, the UA must be registered as in Section 4 and its usage approved and tracked as in Section 5 and 6. This is a common scenario (Figure 10.1) in courses with fieldwork components.

Scenarios where educational use of UAS must be approved and recorded:

- UA is owned by the UC
- UA is operated on or within a University Location.

The Designated Local Authority or location-specific policy or procedure may additionally opt to issue open or standing approval under specific conditions that are deemed to be of low or minor risk on the condition of regular UAS activity reporting.



Figure 10.1: Students flying UC-owned UAS for coursework on a University Location.

10.3 Indoor Use

The use of UAS of all sizes indoors is included within the scope of the Policy. Any UAS operated exclusively indoors is still considered legally an UAS as an aircraft is defined as any contrivance invented, used, or designed to navigate, or fly in, the air (49 U.S.C. 40102).

Though UAS that are operated exclusively indoors are exempt from FAA regulations, the Policy maintains oversight of indoor usage as their usage may still pose a safety risk, albeit easily mitigated.

sUAS below 0.55 lbs often pose little serious risk to persons, however, they may damage property. Mitigation may be accomplished by restricting usage to trained operators or by restricting usage within structures or implementing physical barriers to fragile items.

The Designated Local Authority or location-specific policy or procedure may opt to issue specific restrictions or allowances on the use of UAS indoors. Specific flight information may not always be feasible, but should be reported when it is.

Example Statements for Indoor Use

- Student Clubs or classes must operate within a netted structure designed to prevent damage when operating indoors
- No flying within dorms
- sUAS under 0.55 lbs may be operated indoors in a safe manner that minimizes risk to fire sprinklers.
- Regular indoor UAS activity must submit estimated usage rates.

10.4 Non-University Business Use

All UAS activity on or within the property owned or managed by the UC must be approved before commencing. This includes when Non-University Business occurs at University Locations.

Some common instances of Non-University Business Use

- 3rd Party visitors to University Location
- 3rd Party hired by UC to perform a service
- A student or group of students providing a service.

The review process described in Section 5 remains the same. However, since they are not acting on behalf of the Regents of the University of California, they must obtain their own liability insurance and are responsible for obtaining any necessary authorization for regulatory compliance.

For departments or groups who may wish to use a UAS at a very infrequent rate, it may be more advisable to utilize an existing UC affiliated RPIC rather than hiring a 3rd Party RPIC.

A common scenario is found at University Locations in controlled airspace (Non-Class G airspace). The Systemwide Designated UAS Authority has obtained Airspace Authorizations for many such locations, however it is not transferable to non-University Business Use. If a researcher hires a RPIC for UAS activity on the UC Santa Barbara campus (Class C airspace), the 3rd Party RPIC must have their own Airspace Authorization. As of January 26, 2018, it may take up to 90 days to obtain an Airspace Authorization.

This also applies to students who perform a commercial service at a University Location. Even though the student is a UC student, the student's purpose is not University Business and thus falls into Non-University Business Use.

As of January 26, 2018, FAA regulatory compliance rates for first time applications of Non-University Business Use remain low at 55% compliance. Many first time applications to operate on University Location did not have the correct Remote Pilot Certificate or did not have an Airspace Authorization. As previously noted, it is illegal for the UC to hire an airman to operate who does not have the correct credentials.

10.5 Emergency First Responder Use of UAS

The Policy states that the operation of UAS by emergency first responders may be exempt from the policy based on determination of emergency needs. First responders should refer to their internal department protocols. However, the Systemwide Designated UAS Authority is available to assist in the development of first responder protocols for UAS usage.

11 Services Available

11.1 UC Drones Web Application

UC Risk and Safety Solutions launched an organizational tool called UC Drones to help track UC-owned UA, review and approve UAS activity (Figure 11.1). It can be found at <http://ehs.ucop.edu> as part of the UC Risk and Safety suite of web applications.

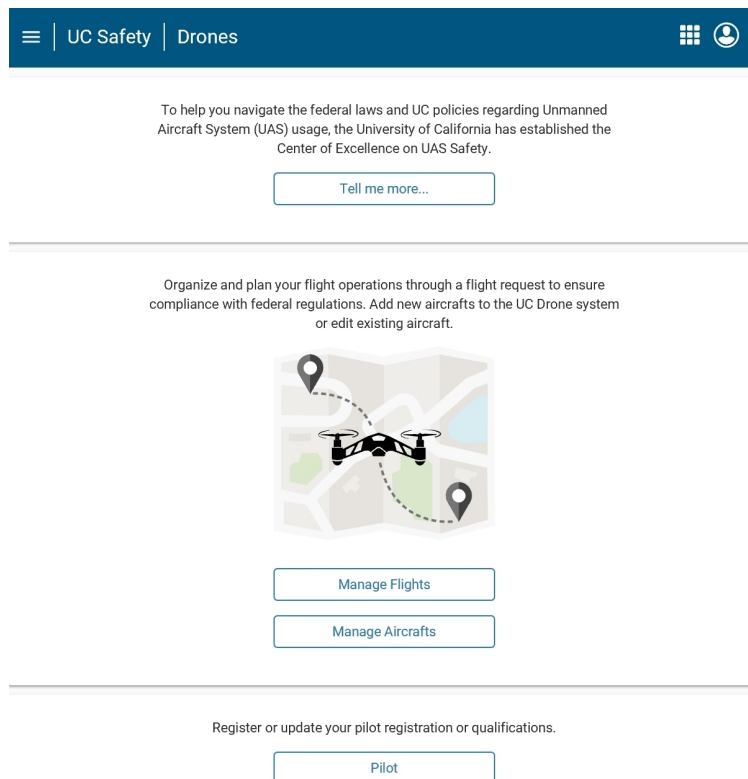


Figure 11.1: UC Drones Web App

The use of UC Drones is encouraged, but not mandatory. Campuses may opt to utilize UC Drones or develop their own solution for the management of UAS records, flight authorizations and flight records.

Designated Local Authorities may utilize UC Drones as means to funnel UAS operation requests, provide notification, grant authorization and document flight activities. As of January 26, 2018, UC Drones is expected to continue to release additional features as requested.

11.2 Filing of FAA Authorizations

The Systemwide Designated UAS Authority is available to assist in the filing of FAA required authorizations. As of January 26, 2018, this includes

- Airspace Authorization for UAS activity in controlled airspace

- Airspace Waiver for UAS activity not allowed with an Airspace Authorization
- Waiver under 14 CFR 107.200. Commonly includes authorizations for night-time operations, flight altitudes above 400 ft AGL or multiple aircraft.
- PAO Certificate of Waiver or Authorization for UAS activity that meets the criteria of a PAO
- Registering of UA used in foreign nations that require 14 CFR 47 registration.

11.3 UAS Training and Certification

The Systemwide Designated UAS Authority supports the development of local UAS training programs and support programs. Material may be provided upon request. In addition, the Systemwide Designated UAS Authority is developing specialized training and certification programs for uncommon scenarios.

12 Enforcement or Restrictions for UAS

The growth of UAS on our UC campuses has also led to rising concerns over inappropriate UAS usage. This section provides guidance on the enforcement of the Policy and campus responses.

12.1 Enforcement and Safety

It is important to note that while the Policy seeks to improve UAS safety by providing oversight, overuse of UAS restrictions may be counter productive. Refer to Section 9.5 for recommendations on proactive means to improve campus safety.

In conjunction with positive means for advocating for UAS safety, there is a role for enforcement of the Policy. The decision to approve or deny UAS activity should not be taken lightly. The best outcome for a complicated scenario should be a discussion of safety concerns and mitigation strategies. However, there will be cases when a formal denial declaration is necessary and a template is provided in Section 19.

12.2 Appropriate Reasons to Restrict UAS usage

While the Policy states that the UAS activity must be reviewed for specific compliance issues, a Designated Local Authority may also review for impacts to University Business and other local issues. Ultimately, there may be additional reasons to restrict UAS usage unrelated to legal compliance. Below are some recommendations for a non-exclusive list of appropriate reasons to restrict UAS usage as well as some reasons that may be overly cautious.

Appropriate Reasons

- Proximity to Medical Helipads
- Privacy concerns within 100 ft distance
- Expected heavy pedestrian or vehicular traffic at the date/time of UAS activity
- Impacts to wildlife
- Detrimental to University Business

Overly Cautious Reasons

- Privacy concerns at distances greater than 100 ft
- Noise concerns at distances greater than 200 ft
- Pedestrian safety when campus activity is non-existent
- Requiring advanced training in low risk locations
- Risk of damage to outdoor equipment or facilities with UAS under 4.4 lbs

12.3 Unauthorized use of UAS on a University Location

Depending on the situation, there are several different approaches. The primary response should be education rather than punishment. Below are four example situations and an appropriate response.

- If there's an immediate and evident safety threat (maliciously endangering others, reckless behavior, etc), call local law enforcement to step in and put a stop to it.
- If the operation of a drone is impeding University Business such as disrupting an event or preventing authorized UAS activity, ask the person to stop and to leave. If they refuse, then it may be considered trespass and the local law enforcement can step in.
- If no one is at immediate risk, the UAS activity is not impeding University Business, but the UAS activity is likely a violation of an applicable federal, state or local regulation, ask the operator to stop and point out the violation. If the operator persists, collect information, and report to the Systemwide Designated UAS Authority.
- If the only violation is that the UAS activity was not requested or approved (everything is legal, safe and its not interrupting anything), ask them to stop, inform them of the policy, and the reason of the policy. Law enforcement action is not advisable, however, the situation may be documented and administrative action may be taken, if appropriate.

12.4 Common Arguments and Potential Counters

Occasionally a UAS operator may disagree with the review or potential enforcement action. In many cases, the disagreement may stem from a misunderstanding of regulations or miscommunication of policy. The following lists some common arguments and a response to clarify the underlying misunderstanding.

Argument: Only the FAA may create airspace regulations

The campus is not creating airspace regulations. It has a policy on where a person may or may not operate a UAS, Model Aircraft or Drone. While on campus property, a person may not operate a UAS without prior approval. The FAA claims sole jurisdiction of the airspace and overflight², but laws and policies such as land-use, zone, privacy and trespass are not subject to Federal Regulation³.

Argument: This area is open to the public, why can't I fly my drone here?

While the University of California is a public agency, this does not mean that its property is not managed. The University has a responsibility to ensure the safety and security of everyone⁴. In order to manage the property, the campus has established that a person may not operate a UAS without prior approval.

Argument: I'm operating as a hobbyist, there are no regulations

Hobbyist operators are subject to Model Aircraft regulations under Public Law 112-95 Section 336. Existing Model Aircraft regulations do not supersede land-use, trespass or privacy regulation. The campus has put into policy that while on campus property, a person may not operate a UAS, Model Aircraft or Drone without prior approval.

Argument: This is a toy, not a Drone

Congress has defined 'UA' as any aircraft that is operated without the possibility of direct human intervention from within or on the aircraft. This definition has no size or weight limit. Following this,

²49 U.S.C. 40103(b)

³Federal Register, Vol. 81, No 124

⁴UCOP Policy PACAOS-40.00 Policy on Use of University Properties

Congress has defined 'Model Aircraft' as an UA that is flown within visual line of sight and flown for recreational purposes. While the UA is flown as a toy, it however is regulated as above. Drones and Model Aircraft under 0.55 lbs do not require registration, but they are not exempt from regulation.

Argument: I have legal authorization from the FAA to fly here

A licensed sUAS operator may have permission to use the airspace, but the campus still has jurisdiction to create policy on where a person may or may not operate a drone on campus property. The FAA makes it clear that an Airspace Authorization or Airspace Waiver does not grant physical property access rights. Under 'Standard Provisions' of an Airspace Authorization or Airspace Waiver, there is a line that states 'Note - This certificate constitutes a waiver of those Federal Rules or regulations specifically referred to above. It does not constitute a waiver of any State law or local ordinance.'⁵

Argument: I'm not causing any problems

The campus has the jurisdiction to determine what is appropriate use of its facilities⁶. If a person is causing legitimate concerns on campus safety, campus security, privacy or interfering with University Business, that person is not using campus facilities appropriately.

⁵An example can be found in many FAA documents, such as Certificate of Waiver or Authorization (Form 7711) including this one here: [link](#)

⁶UCOP Policy PACAOS-40.00 Policy on Use of University Properties

13 Core Competencies for UAS Activity

13.1 Overview of Core Competencies

The growth in UAS activity at the UC has been dramatic. After evaluating the use of UAS over the past year, four major categories of personnel associated with UAS have been identified. As the user base has grown, it has become prudent to formalize the core competencies of each group.

These competencies are the measurable or observable knowledge, skills, abilities and behaviors that are essential for successful performance. This formalization of core competencies establishes the desired minimums for each user group and can be used as a roadmap for readers to assist in identifying their proficiency needs.

13.2 Terms and Definitions

13.2.1 User Groups

- **General User** - a RPIC who operates in exclusively low risk scenarios. A beginner, occasional operator or operates for only specific uses.
- **Power User** - an RPIC who operates regularly in moderate to high risk scenarios. A operator with significant UAS experience and may be tasked to a wide range of UAS activity.
- **UAS Flight Instructor** - a RPIC who additionally provides occasional or regular flight instruction to others.
- **UAS Flight Reviewer** - a UC staff member responsible for reviewing and approving UAS activity. This may include Designated Local Authorities, the Systemwide Designated UAS Authority or other staff member assigned review authority. In some cases, the responsibilities of a UAS Flight Reviewer may be distributed across subject matter experts.

13.2.2 Domains

The core competencies have been organized into four domains:

- UAS Regulations
- Campus Procedures
- Risk Management
- UAS Flight Experience

13.2.3 Knowledge Scale

To clarify some of the language related to the aspect of knowing specific subject matter, the following scale is used.

- 'Is knowledgeable' - The subject matter is well understood by the user.

- 'Is familiar' - The subject matter is familiar to the user to some level of detail.
- 'Is aware' - The existence of the subject matter is known to the user and further details can be ascertained as necessary.

13.2.4 Proficiency Ratings

Within each rubric, users can rate their mastery of each identified competency. The rating scale is as follows:

1. - No proficiency
2. - Limited proficiency
3. - Somewhat proficient
4. - Fully proficient

13.3 General User

Proficiency rating scale: 1 - No proficiency 2 - Limited proficiency 3 - Somewhat proficient 4 - Fully proficient

Rating	Code	Domain	Description
	1A1	UAS Regulations	Is familiar with the applicable federal regulations.
	1A2	UAS Regulations	Is familiar with the registration requirement of a UA.
	1A3	UAS Regulations	Is aware of State or Local regulations.
	1B1	Campus Procedures	Is familiar with the campus local policy or procedures.
	1B2	Campus Procedures	Is familiar with UAS activity reporting requirements.
	1C1	Risk Management	Can identify major risks associated with specific UAS activity.
	1C2	Risk Management	Is able to develop a basic mission plan for specific UAS activity.
	1C3	Risk Management	Is familiar with common potential safety risks.
	1C4	Risk Management	Can prepare a field safety plan as applicable.
	1D1	Operational Experience	Is familiar with the operation and use of specific UA.
	1D2	Operational Experience	Can implement UAS specific pre-flight inspections.

13.4 Power User

Proficiency rating scale: 1 - No proficiency 2 - Limited proficiency 3 - Somewhat proficient 4 - Fully proficient

Rating	Code	Domain	Description
	2A1	UAS Regulations	Is familiar with the applicable federal regulations.
	2A2	UAS Regulations	Is familiar with the registration requirement of a UA.
	2A3	UAS Regulations	Is familiar of State or Local regulations.
	2B1	Campus Procedures	Is familiar with the campus local policy or procedures.
	2B2	Campus Procedures	Is familiar with UAS activity reporting requirements.
	2B3	Campus Procedures	Can coordinate and communicate across various campus stakeholders regarding the use of UAS.
	2C1	Risk Management	Can identify major risks associated with specific UAS activity.
	2C2	Risk Management	Is able to develop a detailed mission plan for specific UAS activity.
	2C3	Risk Management	Is familiar with common potential safety risks.
	2C4	Risk Management	Can identify potential risks to privacy, civil rights or civil liberties.
	2C5	Risk Management	Implements a risk management process.
	2C6	Risk Management	Can develop a site safety plan.
	2C7	Risk Management	Can prepare a field safety plan as applicable.
	2D1	Operational Experience	Has significant flight experience with specific UAS.
	2D2	Operational Experience	Is familiar with the flight performance of a range of UAS.
	2D3	Operational Experience	Anticipates and plans for off-nominal situations.

13.5 UAS Flight Instructor

Proficiency rating scale: 1 - No proficiency 2 - Limited proficiency 3 - Somewhat proficient 4 - Fully proficient

Rating	Code	Domain	Description
	3A1	UAS Regulations	Can determine the licensing requirement of a proposed UAS activity.
	3A2	UAS Regulations	Can determine the registration requirement of a UA.
	3A3	UAS Regulations	Is aware when a UAS is considered a Model Aircraft.
	3A4	UAS Regulations	Can identify potential violations of FAA regulations.
	3A5	UAS Regulations	Can identify potential violations of State or Local regulations.
	3A6	UAS Regulations	Articulates UAS regulations effectively.
	3B1	Campus Procedures	Is knowledgeable with the campus local policy or procedures.
	3B2	Campus Procedures	Can identify the communication chain of command for the authorization of UAS activity at a University Location.
	3B3	Campus Procedures	Serves as a source of expertise and guidance for UAS activity.
	3B4	Campus Procedures	Provides accurate and timely reporting of UAS activity.
	3C1	Risk Management	Determine an approximate Risk Level of a UAS activity
	3C2	Risk Management	Can identify potential risks to privacy, civil rights or civil liberties.
	3C3	Risk Management	Is familiar with common potential safety risks.
	3C4	Risk Management	Can identify potential risks to privacy, civil rights or civil liberties.
	3C5	Risk Management	Implements a risk management process.
	3C6	Risk Management	Can develop a site safety plan.
	3C7	Risk Management	Can develop a field safety plan as applicable.

	3C8	Risk Management	Consistently demonstrates effective risk management for UAS activity.
	3D1	Operational Experience	Serves as a source of expertise and guidance for the safe operation of UAS.
	3D2	Operational Experience	Anticipates UAS operation and risks accurately to assess safety risks.
	3D3	Operational Experience	Maintains a high level of UAS proficiency.
	3D4	Operational Experience	Is effective and convincing in promoting UAS safety.

13.6 UAS Activity Reviewer

Proficiency rating scale: 1 - No proficiency 2 - Limited proficiency 3 - Somewhat proficient 4 - Fully proficient

Rating	Code	Domain	Description
	4A1	UAS Regulations	Can determine the licensing requirement of a proposed UAS activity.
	4A2	UAS Regulations	Can determine the registration requirement of a UA.
	4A3	UAS Regulations	Is aware when a UAS is considered a Model Aircraft.
	4A4	UAS Regulations	Can identify potential violations of FAA regulations.
	4A5	UAS Regulations	Can identify potential violations of State or Local regulations.
	4B1	Campus Procedures	Is knowledgeable with the campus local policy or procedures.
	4B2	Campus Procedures	Can coordinate communication for the authorization of UAS activity at a University Location.
	4B3	Campus Procedures	Is familiar with insurance and can determine the insurance requirement of a UAS activity.
	4B4	Campus Procedures	Can make effective decisions on the applicability of an Export Control review.
	4C1	Risk Management	Can determine an approximate Risk Level of a UAS activity
	4C2	Risk Management	Is able to identify potential risks to privacy, civil rights or civil liberties.
	4C3	Risk Management	Is familiar with common potential safety risks.
	4C4	Risk Management	Is able to review field safety or site safety plans.
	4D1	Operational Experience	Is familiar with the general performance of common UAS models.
	4D2	Operational Experience	Is familiar with the general operational and logistical requirements of UAS activity.

14 Related Information

14.1 FAA Resources

FAA Website:

<http://www.faa.gov>

Fly for Fun:

https://www.faa.gov/uas/getting_started/fly_for_fun/

Fly for Work/Business:

https://www.faa.gov/uas/getting_started/fly_for_work_business/

14.2 UC Center of Excellence on UAS Safety

Website:

<http://ucop.edu/enterprise-risk-management/resources/centers-of-excellence/unmanned-aircraft-systems-safety.html>

Privacy Best Practices:

http://ucop.edu/enterprise-risk-management/_files/uas/Best%20Practices%20for%20Privacy.pdf

Insurance Minimums:

http://ucop.edu/enterprise-risk-management/_files/uas/Insurance.pdf

UC Drones Web Application:

<http://ehs.ucop.edu/drones>

User Guide for UC Drones:

http://ucop.edu/enterprise-risk-management/_files/uas/UC%20Drones%20User%20Guide.pdf

Top 10 Safety Tips:

http://ucop.edu/enterprise-risk-management/_files/uas/TopTipsForSafety.pdf

14.3 Regulations

Public Law

- Public Law 112-95, Title III, Subtitle B- Unmanned Aircraft Systems - Section 331-336 https://www.faa.gov/uas/programs_partnerships/uas_arctic/media/Sec_331_336_UAS.pdf
- Public Law 114-90, Title II, Subtitle B - UAS Safety https://www.faa.gov/uas/resources/uas_regulations_policy/media/Pages-from-PLAW-114publ190.pdf

CFR

- 14 CFR 1 - DEFINITIONS, CIVIL AIRCRAFT
- 14 CFR 47 - AIRCRAFT REGISTRATION

- 14 CFR 48 - REGISTRATION AND MARKING REQUIREMENTS FOR SMALL UNMANNED AIRCRAFT
- 14 CFR 91 - GENERAL OPERATING AND FLIGHT RULES
- 14 CFR 101 - MOORED BALLOONS, KITES, AMATEUR ROCKETS, UNMANNED FREE BALLOONS, AND CERTAIN MODEL AIRCRAFT
- 14 CFR 107 - SMALL UNMANNED AIRCRAFT SYSTEMS

14.4 FAA Advisory Circulars, Joint Orders

In addition to federal regulations, additional UAS guidance and interpretations are provided by the FAA.

- Summary of the Small UAS Rule (Part 107)
- Interpretation of the Special Rule for Model Aircraft
- Interpretation of UAS Operations by Public Universities for Aeronautical Research
- Interpretation of Media Use of UAS
- Educational Use of Unmanned Aircraft Systems (UAS)
- Advisory Circular AC 00-1.1A - Public Aircraft Operations
- Advisory Circular AC 91-57A - Model Aircraft Operating Standards
- FAA Order JO 7200.23 Unmanned Aircraft Systems

15 Summary of Specific Regulations

15.1 14 CFR 107 - SMALL UNMANNED AIRCRAFT SYSTEMS

The introduction of 14 Code of Federal Regulations (CFR) 107 enabled a wide range of Small Unmanned Aircraft System (sUAS) usage under a set of defined limitations. A Compliance List for 14 CFR 107 is provided below.

15.1.1 Operator Requirements

- A person operating an sUAS must either
 1. hold a Remote Pilot Certificate with an sUAS rating
 2. or be under the direct supervision of a person who does hold a Remote Pilot Certificate (Remote Pilot in Command (RPIC)).

Note: Until international standards are developed, foreign-certificated Unmanned Aircraft System (UAS) RPIC will be required to obtain an Federal Aviation Administration (FAA)-issued Remote Pilot Certificate with an sUAS rating.

- A person may not operate an sUAS if he or she knows or has reason to know of any physical or mental condition that would interfere with the safe operation of an sUAS.
- Foreign nationals are allowed to operate under Part 107 if they satisfy the requirements of 14 CFR 375. Typical allowances:
 - Non-commercial operations
 - Recreational activity
 - Specific research activities
 - Foreign nationals from Canada or Mexico (Order 97-7-3, FAA)

15.1.2 Aircraft

- Unmanned aircraft must weigh less than 55 lbs. (25 kg).
- Unmanned aircraft must be registered with either a “N” number or an “FA” number.
- Unmanned aircraft must be inspected prior to flight by the remote pilot in command.

15.1.3 Airspace Requirements

- Operations in Class G airspace are allowed without Air Traffic Control (ATC) permission.
- Operations in Class B, C, D and E airspace are allowed with an gIsAA or gIsAW. Operating limitations are specified within a Certificate of Waiver or Authorization (Form 7711) provided by the FAA.

15.1.4 Operating Limitations

- Visual Line of Sight (VLOS) only. Note: The unmanned aircraft must remain within VLOS of the remote pilot in command and the person manipulating the flight controls of the sUAS.
- At all times the sUAS must remain close enough to the RPIC and the person manipulating the flight controls of the sUAS for those people to be capable of seeing the aircraft with vision unaided by any device other than corrective lenses. Note: First-Person View (FPV) cameras do not satisfy VLOS or visual contact regulations, but may be used.
- An sUAS may not operate over any persons not directly participating in the operation, not under a covered structure, and not inside a covered stationary vehicle. Note: Prior notice and/or consent is not sufficient.
- Daylight-only operations, or civil twilight (30 minutes before official sunrise to 30 minutes after official sunset, local time) with appropriate anti-collision lighting.
- Maximum groundspeed of 100 mph (87 knots).
- Maximum altitude of 400 feet Above Ground Level (AGL) or, if higher than 400 feet AGL, remain within 400 feet of a structure.
- Minimum weather visibility of 3 miles from control station.
- No person may act as a RPIC or Visual Observer (VO) for more than one unmanned aircraft operation at one time.
- No operations from a moving aircraft.
- No operations from a moving vehicle unless the operation is over a sparsely populated area.
- No careless or reckless operations.
- No carriage of hazardous materials.
- External load operations are allowed if the object being carried by the unmanned aircraft is securely attached and does not adversely affect the flight characteristics or controllability of the aircraft.
- Transportation of property for compensation or hire allowed provided that-
 - The aircraft, including its attached systems, payload and cargo weigh less than 55 pounds total;
 - The flight is conducted within visual line of sight and not from a moving vehicle or aircraft; and
 - The flight occurs wholly within the bounds of a State and does not involve transport between (1) Hawaii and another place in Hawaii through airspace outside Hawaii; (2) the District of Columbia and another place in the District of Columbia; or (3) a territory or possession of the United States and another place in the same territory or possession.

15.2 Model Aircraft

15.2.1 Statute Definition of Model Aircraft

A model aircraft is defined as:

- Capable of sustained flight in the atmosphere;
- Flown within visual line of sight of the person operating the aircraft; and
- Flown for hobby or recreational purpose

15.2.2 Operation of Model Aircraft

Model Aircraft may be flown under the following set of conditions:

- The aircraft must be flown strictly for hobby or recreational use;
- The aircraft must be operated in accordance with a community-based set of safety guidelines and within the programming of a nation-wide community-based organization. (See next page)
- The aircraft is
 - less than 55 lbs or
 - The aircraft is certified through a design, construction, inspection, flight test and operational safety program administered by a community-based organization.
- The aircraft is operated in a manner that does not interfere with and gives way to any manned aircraft
- All airports within 5 miles of the flight are notified prior to flight.

15.2.3 Definition of Hobby or Recreational Use

Hobby or recreational use is defined as

- Operated for fun or outside of one's regular occupation
- Operated in furtherance of one's education at an accredited educational institution

Activities that do not qualify for Model Aircraft Regulations

- Commercial activity with compensation
- Commercial activity without compensation
- Activity in furtherance of a business
- Research activity

Further information can be found within the Interpretation of the Special Rule for Model Aircraft

15.2.4 Definition of 'Community-based set of safety guidelines and within the programming of a Nationwide Community-Based Organization'

The FAA has interpreted this statement as community-based organizations would include groups such as the Academy of Model Aeronautics (AMA) and others that meet the statutory definition. Model Aircraft operations must comply with the following safety guidelines.

Relevant items from the AMA Safety Code: <https://www.modelaircraft.org/files/105.pdf>
Model aircraft pilots will:

- Yield the right of way to all human-carrying aircraft.
- See and avoid all aircraft and a spotter must be used when appropriate. (AMA Document #540-D.)
- Not fly higher than approximately 400 feet above ground level within three (3) miles of an airport without notifying the airport operator.
- Not interfere with operations and traffic patterns at any airport, heliport or seaplane base except where there is a mixed use agreement.
- Ensure the aircraft is identified with the name and address or AMA number of the owner on the inside or affixed to the outside of the model aircraft. (This does not apply to model aircraft flown indoors.)
- Not operate model aircraft while under the influence of alcohol or while using any drug that could adversely affect the pilot's ability to safely control the model.
- Maintain control during the entire flight, maintaining visual contact without enhancement other than by corrective lenses prescribed for the pilot.
- Fly using the assistance of a camera or FPV only in accordance with the procedures outlined in AMA Document #550.
- Fly using the assistance of autopilot or stabilization system only in accordance with the procedures outlined in AMA Document #560.

RADIO CONTROL (RC)

- All pilots shall avoid flying directly over unprotected people, vessels, vehicles or structures and shall avoid endangerment of life and property of others.
- A successful radio equipment ground-range check in accordance with manufacturer's recommendations will be completed before the first flight of a new or repaired model aircraft.
- At all flying sites a safety line(s) must be established in front of which all flying takes place. (AMA Document #706.)
 - Only personnel associated with flying the model aircraft are allowed at or in front of the safety line.
 - At air shows or demonstrations, a straight safety line must be established.
 - An area away from the safety line must be maintained for spectators.
 - Intentional flying behind the safety line is prohibited.

- RC model aircraft must use the radio-control frequencies currently allowed by the Federal Communications Commission (FCC).
- No powered model may be flown outdoors closer than 25 feet to any individual, except for the pilot and the pilot's helper(s) located at the flightline.
- Under no circumstances may a pilot or other person touch an outdoor model aircraft in flight while it is still under power, except to divert it from striking an individual.
- RC night flying requires a lighting system providing the pilot with a clear view of the model's attitude and orientation at all times. Hand-held illumination systems are inadequate for night flying operations.

16 Frequently Asked Questions

This is a list of Frequently Asked Questions related to the Policy and its implementation.

A short list of Frequently Asked Questions for end-users can be found at: <http://ucop.edu/enterprise-risk-management/resources/centers-of-excellence/unmanned-aircraft-systems-safety.html>

1. Does this policy apply to balloons and/or rockets?
The policy does not apply to balloons or rockets.
2. Does the policy apply to international UAS activity?
Yes, the policy applies to international UAS activity. The policy requires that UAS activity must comply with all applicable regulations; in the case of international locations, the applicable regulations would be the local regulations of the international site. To the extent that safety practices or best practices may differ internationally, the UAS activity should be reviewed on a case-by-case basis.
3. Does the policy require a 14-day lead time per flight?
The policy does not require a 14-day lead time per flight. The policy requires that UAS activity requires prior approval (which must be reviewed within 14 days), but does not place a pre-defined requirement for advance notice nor does it limit the terms and conditions of an approval. As described in Section 5.1, a researcher may be granted standing approval to operate a designated location under a set of agreed upon terms and conditions.
4. Does the policy require each individual flight to go through an approval process?
No. An approval may be granted to a set of flights as long as the proponent can demonstrate compliance with the minimum standards within the Policy.
5. What if the weather is unsatisfactory during an approved 'window?'
It is recommended that the terms of approval include procedures to address contingencies such as rescheduling. In situations where changes to a specified time window has no effect on coordination or safety, there may be no need to resubmit or require a second review. However, there may be situations where scheduling may be necessary.
6. Is possession of a Remote Pilot Certificate sufficient for approval for UAS activity?
The Remote Pilot Certificate is an indication that the Remote Pilot in Command (RPIC) passed a knowledge exam. It does not attest to the quality of the RPIC's experience with flying Unmanned Aircraft System (UAS) or the RPIC's knowledge of safety practices. By itself, the Remote Pilot Certificate is not sufficient in all cases. However, where UAS activity risk is mitigated through other means such as remote location, or while operating a low risk Unmanned Aircraft (UA), simply having earned the Remote Pilot Certificate may be sufficient.
7. May a Designated Local Authority require only a \$1Mil aviation liability coverage for a 3rd party user?
It is recommended that all 3rd party UAS activity is covered under a \$5Mil aviation liability insurance policy. A local Designated Local Authority may opt to reduce the minimum coverage requirements, but should consult local Risk Services.
8. Why is oversight necessary?
There are many arguments for the University of California (UC) to mandate oversight; not all of

them may be applicable for every situation but collectively form sufficient justification. The UC has an obligation to be fully compliant with all applicable regulations. In some cases, there are specific regulatory compliance obligations to meet. In other cases, the UC's UAS insurance has compliance obligations. There are many concerns over the usage of UAS on-campus from a public safety and privacy perspective. In other cases, there are arguments that UC business use should be able to take priority over 3rd Party use. None of these determinations can be made unless there is a mechanism to screen for issues. It must be noted that the Policy does not prohibit procedures to ensure an alternative means of compliance.

9. The Federal Aviation Administration (FAA) has already created UAS regulations. Why is the Policy necessary?

The FAA has sole jurisdiction of the airspace and overflight however this is also the extent of their jurisdiction. The FAA regulations do not address other regulatory compliance issues such as export control, privacy, trespass harassment of wildlife or other land-use issues. The FAA regulations also do not address the prioritization of University Business or other campus policies on commercial use or filming. In addition, FAA regulations regarding UAS are in flux and may change with acts of Congress, court cases and through traditional rule making processes. Incorrect interpretations of UAS regulations is common. The Policy enables oversight to ensure compliance while regulations are in flux.

10. What would happen if there's a disagreement between the Designated Local Authority and the Systemwide Designated UAS Authority?

In most cases, if a Designated Local Authority is appointed, the Designated Local Authority would adjudicate the final ruling. If there is a question over regulatory compliance, the Systemwide Designated UAS Authority and General Counsel would adjudicate clarification over the regulatory compliance aspect.

17 Example Request for Information

Thank you for reaching out to us to use Unmanned Aircraft System (UAS) on our campus. Before we can approve your usage, we must validate that the activity is legal, will be conducted safely and will not interfere with University Business.

Please provide the following information, if applicable, or your contingency plan:

- Remote Pilot Certificate with Small Unmanned Aircraft System (sUAS) rating
- Aircraft Registrations
- Certificate of Insurance
- Proposed Flight plan, annotated map preferred
- Safety plans (if appropriate)
 - Emergency Procedures
 - Crew management
 - Crowd control

In general, the proposed operation should not be to fly over campus indiscriminately. The Remote Pilot in Command (RPIC) should select specific flight routes or areas with clear visibility to intruding air traffic and intruding pedestrian traffic and designed such that risks can be effectively managed. Below are some of the typical terms of approval usually applied to on-campus UAS activity.

- Require the use of additional persons for crowd control to make sure no one walks into the areas of flight.
- No flying over buildings, utility poles, vehicles or trees
- No flying beyond 500 ft of the operator
- Submit flight records within 2 days of UAS activity. Include: location, time, aircraft, pilot and any incidents/accidents

UAS activity may be reviewed on a case-by-case basis and the terms of approval may differ.

18 Risk Scoring for UC UAS activity

This risk score has been developed to gauge the level of risk and recommend requirements to enable the proposed UAS activity.

Instructions: Select the Risk Score that best matches the proposed UAS activity. Significant variation of descriptions may indicate further information or modification to activity is required.

UAS Flight Risk Score	Level 1	Level 2	Level 3	Level 4	Level 5
Risk Level	Minor Risk	Low Risk	Escalated Risk	Moderate Risk	High Risk
Description	Generally safe activity	Some risks to location or operation	Some risks to non-participants or other hazards	Poses risks to others, including safety and privacy concerns	Significant risks, may require special exemption and authorization.
Example	Recurrent UAS activity over row crops	Training new RPIC or operating in a new location	Filming production on campus	Filming a crowd at an event	Flying over people
RPIC Experience	RPIC has sufficient experience	Any level of experience	RPIC has documented experience	RPIC has significant documented experience	RPIC has significant documented experience and meets any extra requirements.
Aircraft	Proven or mature aircraft with documented maintenance	May be experimental or in development	Proven or mature aircraft with documented maintenance	Proven or mature aircraft with documented maintenance	May require additional safety features
Location	Secured or controllable environment.	Open location	Unsecured location or in proximity of non-participants	In close proximity to non-participants or exists significant privacy concerns	In locations where special authorization is required.
Hazards	Few if any visual obstructions. Acceptable level of risk to objects on ground	Few if any visual obstructions. Acceptable level of risk to objects on ground	Some visual obstructions or other ground hazards	Obstructions or ground hazards, including non-participants	May have significant hazards associated with the UAS activity.
Airspace	Class G	Class G, with some expected air traffic	Controlled airspace with FAA authorization	Controlled airspace with FAA authorization	Any airspace
Recommended Requirements	No additional requirements	Documentation of site safety	Safety plan, including non-participant safety	Safety plan, including non-participant safety. May require additional planning for privacy and uncommon hazards	Safety plan, including non-participant safety. May require additional planning for privacy, uncommon hazards or documentation of non-standard regulatory compliance.

UC approval does not absolve the RPIC's responsibility to ensure a safe operating environment.

19 Example Denial Template

Thank you for utilizing UC Drones to request a UAS flight. UAS flights are reviewed on a case-by-case basis for compliance with federal, state, and local laws as well as impacts on safety and privacy by the UC Center of Excellence on UAS Safety, Campus Risk Management, and University police. Unfortunately, we cannot allow this flight activity for one or more of the following reasons:

LEGAL OR POLICY ISSUES

- The proposed flight operations are prohibited by campus policies
- The proposed pilot does not have the correct Federal Aviation Administration Pilot Certificate
- The proposed pilot does not have the requisite Federal Aviation Administration Airspace Authorization or Airspace Waiver
- The aircraft is not correctly registered as a non-model aircraft with the FAA while being used for non-recreational purposes
- The proposed flight operation would violate FAA regulations without special authorization from the FAA
 - Night operations (14 CFR 107.29)
 - Visual line of sight (14 CFR 107.31)
 - Flight over people (14 CFR 107.39)
 - Other:
- The proposed flight operation would violate FAA regulation. Cite all applicable:
- The proposed flight operation would violate Public Law 112-95, Section 336 – Special Rule for Model Aircraft. Cite all applicable:
- The proposed pilot does not have sufficient aviation liability coverage.
- Other, please describe:

SAFETY ISSUES

- The proponent did not provide evidence of insurance
- The proponent did not provide a sufficient safety case for operating near non-participants
- The proponent did not provide a sufficient safety case for operating near vehicular traffic
- The proposed pilot has not demonstrated sufficient skill for the operation
- The proposed flight altitude is unsuitable for the proposed flight location
- The proposed flight location contains numerous hazards
- Environmental conditions reduce the safety of the operation past acceptable levels
- There are other flights in the area at a similar time
- Other, please describe:

PRIVACY ISSUES

- The flight passes close by sensitive areas without proper precautions
- The operation carelessly collects data from bystanders
- The flight is in an area where people have a reasonable sense of privacy
- There is a history of privacy violations from members involved in the operation
- Other, please describe:

Rejection of a UAS operation is not limited to the list above, but serves to provide common cases for dismissal. Rejection may be a result of extenuating circumstances, compounding risks, or other factors that are not included on this list. This list may be subject to change in the future, due to changes in FAA law, campus policy, or local and state legislation. As such is important to consider these factors when submitting a flight request and attempt to address all non-listed concerns prior to submission.

20 Example Terms of Approval

The Policy does not mandate specific terms for approval for UAS activity. However, there are many situations where special terms of approval should be required. Below includes a handful of common conditions found in Terms of Approvals from a wide range of UAS activity proposed in the past year.

Notification Requirements

- Must notify Designated Local Authority at least 24 hours in advance
- Must coordinate with facility manager
- No prior notification required
- Must notify campus PD at least 72 hours in advance
- Must check in with front office prior to flight
- Must call airport manager at least 45 minutes before flight

Communication Requirements

- Constant communication not required
- A supporting ground crew member must monitor an aviation radio
- Remote Pilot in Command (RPIC) must be reachable via radio during the event

Operational Limitations

- Flight altitude restricted to under 200 ft Above Ground Level (AGL)
- Unmanned Aircraft (UA) must remain at least 50 ft away from any non-participants
- UA racing path must run parallel to the flight line
- UA may not fly over trees or buildings
- UA must stay below the tree line
- UA may not be flown for more than 7 minutes at a time
- UA may not be flown within 150 ft of a residential window

Currency Requirements

- The RPIC must have logged three UAS activities with a UA of the same make/model within the past 90 days.
- The RPIC must have logged six night-time UAS activity within the past 90 days.
- The RPIC must have logged three UAS activities of a similar Risk Level or higher within the past 90 days.

Post Flight Reporting

- RPIC must submit a post-flight report within 2 days of the UAS activity.

- RPIC must submit a set of post-flight reports at the end of every month, no later than 5 business days after the end of the month.
- Course Instructor must submit a proposal of indoor activities and expected usage in lieu of post-flight reporting.

21 Best Practices for UAS Privacy

Overview

In the United States today, the use of Unmanned Aircraft System (UAS) for both recreation and commercial use are becoming ever more prominent. UAS may be used for a variety of applications, including photography and videography. The capture and use of photographs and videos from a UAS platform raises new concerns on the rights, privacies, and permissions that involve both the operators of UAS and individuals that are uninvolved in the operation. The University of California recognizes the important value of privacy and strives to achieve an appropriate balance ensuring an appropriate level of privacy, nurturing an environment of openness, honoring its obligation as a public institution to remain transparent while safe guarding information about individuals.

Best Practices

- **Do not** use a UAS to monitor or record activities where there is a reasonable expectation of privacy.
- **Do not** use a UAS for unapproved recordings of any campus events or performances, or for any unlawful purposes.
- **Do not** fly a UAS over private property without prior approval.
- **Do not** use a UAS to harass people or intentionally disrupt events
- **Do not** use a UAS for the specific purpose of persistent and continuous collection of identifiable data about individuals without the consent of the data subjects.
- **Do not** retain identifiable data longer than reasonably necessary to fulfill a purpose.
- **Do not** knowingly publicly disclose data collected with a UAS without undertaking a reasonable effort to obfuscate or de-identify identifiable data unless the data subjects provide specific consent to the disclosure.
- **Do** make a reasonable effort to provide prior notice to individuals of the general timeframe and area that they may anticipate a UAS intentionally collecting data.
- **Do** establish and make available a Privacy Policy for UAS data if the UAS may intentionally or unintentionally collected identifiable data. The policy should be appropriate to the size and complexity of the data collected.
- **Do** be considerate of other people's concerns over privacy, security and safety.
- **Do** contact the Office of Research Compliance and Integrity if identifiable data is to be used for human-subject research.
- **Do** take steps to ensure the security of any identifiable data.

22 UAS Policy Full Text

22.1 Policy Statement

The University recognizes that Unmanned Aircraft System (UAS) and Small Unmanned Aircraft System (sUAS) offer great potential as tools for research and other educational functions as well as providing opportunities for recreational use and business pursuits across a diverse array of users and industries. The University also has an obligation to consider public safety, privacy, civil rights, and civil liberties issues related to the use of UAS.

This Policy establishes a Systemwide Designated UAS Authority and a UAS Advisory Board to provide oversight of the use of UAS and to develop and implement policies and guidance for the use of UAS. Executive Officers may assign a Designated Local Authority and authorize the development and implementation of location-specific policies or procedures at any University Location within the Executive Officer's jurisdiction. A Designated Local Authority may be authorized to provide oversight at a University Location.

It is the policy of the University that anyone who seeks to operate a University-owned UAS, a UAS for University Business or on a University Location must comply with the following:

- Have approval from the appropriate aviation agency and operate in compliance with all applicable regulations and rulings.
- Receive approval in advance from the Designated Local Authority at a specific University Location or Systemwide Designated UAS Authority.
- Operate in a manner that ensures public safety, right to privacy, civil rights and civil liberties.
- Maintain sufficient liability insurance coverage.

A University location-specific policy or procedure may further define an approval process or processes that addresses recurrent, standing, conditional or other forms of approval that constitute written approval. Additional conditions or restrictions may be agreed upon and attached to the approval. A University location-specific policy or procedure may additionally further define UAS activity reporting requirements.

Some exceptions from the provisions in this Policy may be made on a case by case basis after review and approval by the UAS Advisory Board, which shall consider and balance relevant factors such as human health and safety, environmental concerns, privacy, the purpose of the proposed UAS activity, and operator experience. The justification for any such exceptions shall be documented in writing by the UAS Advisory Board.

22.2 Compliance/Responsibilities

The goal of this Policy is to ensure that all UAS activities are conducted in a manner that ensures the protection of students, faculty, staff, visitors, the public, property, and the environment and complies with all applicable laws and regulations. The following individuals have the particular responsibilities for implementing the principles and practices of this Policy.

- A. Executive Officers or their designees are responsible for:

- Communicating the University's commitment to individual's rights safety, privacy, civil rights, and civil liberties.
 - Oversight of the interpretation and effective implementation of this Policy at University Locations within their jurisdiction.
 - Adopting procedures to ensure implementation of this UAS Policy.
 - Authorizing the development and implementation of University location-specific policies or procedures, as applicable.
 - Assigning a Designated Local Authority as a point of contact who is responsible for developing, implementing, and enforcing University Location-specific requirements, as applicable.
- B. The University of California Office of the President (UCOP) Environment, Health & Safety (EH&S) Executive Director is responsible for:
- Providing Policy interpretation and responding to general inquiries regarding UAS activities.
 - Enforcing the provisions of this Policy.
 - Assigning a Systemwide Designated UAS Authority.
 - Maintaining records of the results and decisions of the Systemwide Designated UAS Authority.
 - Making UAS records publically available as appropriate.
 - Appointing members to the UAS Advisory Board.
- C. The Systemwide Designated UAS Authority is responsible for:
- Providing UAS regulatory interpretation and assistance with compliance.
 - Ensuring Policy compliance with applicable laws and regulations.
 - Providing assistance with requests for UAS activities consistent with applicable laws and regulations and Policy requirements, unless a Designated Local Authority has been selected and delegated this task for specific University Locations.
 - Providing support in communication with regulatory authorities, and when appropriate, acting on behalf of University faculty and staff as a point of contact to the applicable aviation authority for UAS registration and flight operations.
 - Providing a central repository for all applicable regulations and policies, including international, federal, state and local regulations, and University of California (UC) location-specific policy or procedure and other agency policies, as appropriate.
 - Maintaining a record of UAS activity covered under this Policy.
 - Implementing effective mechanisms for reporting in order to remain in compliance with applicable laws and policies.
 - Providing a forum to communicate and share UAS-related information and best practices.
 - Coordinating the development of University UAS policies through task forces/working groups.
- D. The UAS Advisory Board is responsible for:

- Reviewing exceptions from this Policy on a case-by-case basis, subject to the requirements in Section III, above.
 - Assisting in the development of systemwide UAS policies.
 - Reviewing and commenting on proposed policies and long-term goals.
 - Evaluating the effectiveness of systemwide UAS policies and safety metrics.
 - Ensuring that systemwide UAS policies remain consistent with applicable privacy best practices.
- E. A Designated Local Authority (if assigned by an Executive Officer or his/her designee) is responsible for:
- Developing location-specific policy or procedure that meet or exceed the requirements of this Policy.
 - Providing assistance with requests for UAS activities consistent with applicable laws and regulations and University Location-specific policies or procedures.
 - Reviewing and approving applications for operation of UAS within the Designated Local Authority's jurisdiction.
 - Notifying the applicant if the flight authorization request is approved, denied, or if the flight authorization request will require further information or appropriate aviation agency authorization.
 - Maintaining a record of approval requests and decisions, which shall be submitted to the Systemwide Designated UAS Authority upon request.
 - Maintaining a record of all UAS flights at University Locations within the Designated Local Authority's jurisdiction, which record shall be submitted to the Systemwide Designated UAS Authority upon request.
- F. Operators of UAS are responsible for:
- Requesting and obtaining all proper approvals prior to operating a UAS at any University Location or for any University Business.
 - Following the requirements of this Policy and all applicable laws and regulations.
 - Maintaining a safe UAS operating environment.
 - Following applicable University UAS privacy best practices.
 - Reporting UAS activity to the Designated Local Authority or Systemwide Designated UAS Authority.
 - Immediately reporting any accident that results in injury or property damage to the Designated Local Authority or Systemwide Designated UAS Authority.

22.3 Required Procedures

This Policy sets minimum systemwide requirements for operating UAS. The requirements below must be followed at all University Locations. Individual campuses, medical centers, Agriculture and Natural

Resources locations, and Lawrence Berkeley National Laboratory, through their respective Designated Local Authorities, may also develop policies and procedures as long as they meet or exceed the requirements of this Policy. The operation of UAS by emergency first responders may be exempt from this Policy based on determination of emergency needs. During such operations, the emergency responders will follow their internal department protocols.

A. General Procedures

- All persons seeking to operate a University-Owned UAS, a UAS for University Business, or at University Locations must first submit a completed UAS Request Form to the Designated Local Authority or Systemwide Designated UAS Authority in advance of any UAS activity.
- The Designated Local Authority or Systemwide Designated UAS Authority will review and process the request and notify the applicant if the request is approved, denied, or will require further information no later than two weeks after submission of an application.
- The request must be reviewed for
 - Compliance with applicable regulations and policies
 - Impacts to public safety
 - Impacts to privacy
 - Impacts to civil rights and civil liberties
 - Compliance with insurance requirements
- Once approved, the operator must follow the requirements of this Policy, any conditions required by the approval, and all applicable laws and regulations.
- A copy of the approval must be in the possession of the operator at all times during the activity and, upon request, must be presented to any University official or representative with jurisdiction over the activity.
- The operator must follow University privacy best practices at all times, including, but not limited to:
- UAS may not be used to monitor or record activities where there is a reasonable expectation of privacy.
- UAS must not be used for unapproved recordings of any campus events or performances, or for any unlawful purpose.
- The operator must provide a post-flight report of UAS activity to the Designated Local Authority or Systemwide Designated UAS Authority as soon as possible.
 - Any accident that results in injury or property damage must be reported immediately.

B. Registration of UAS

- All UC-owned UAS must be registered in accordance with all applicable laws, regulations, and requirements.
- Registration documents for UC-owned UAS must be submitted to the Designated Local Authority or Systemwide Designated UAS Authority and must reflect the following ownership data:

The Regents of the University of California (University Location Address)

- Registration documents for all UAS used for University Business must be submitted to the Designated Local Authority or Systemwide Designated UAS Authority.

C. Liability Insurance

- All UAS activity covered under this Policy must have aviation liability coverage.
- Any 3rd Party or Non-University Business UAS activity must additionally include a written agreement that indemnifies and holds the University harmless from any claims or harm to individuals, damage to University property, and any other claims, liabilities, and potential penalties.
- Recreational users, at the discretion of the Designated Local Authority, may be exempt from the liability insurance requirement if the Designated Local Authority determines that the proposed recreational use poses no risk to the health and safety of persons, property, or the environment and that the cost of liability insurance would pose an undue hardship to the recreational user.

D. Export Control

- All UAS activity for University Business in foreign nations or by foreign nationals must follow export control regulations and the UC Export Control Policy.
- All UAS activity involving the export of a UAS internationally or use of an export-controlled UAS must be reviewed by the appropriate export control officer.

Glossary

3rd Party For the purposes of this policy, a 3rd Party is defined as any person who is either not affiliated with the UC or not conducting University Business

Academy of Model Aeronautics The Academy of Model Aeronautics (AMA) is an model aviation association that fulfills the definition of a Nationwide Community-Based Organization.

Airspace Authorization The term 'Airspace Authorization' means a short term or temporary authorization granted by the Federal Aviation Administration (FAA) to a specific organization or person to operate within controlled airspace. An 'Airspace Authorization' is granted with a Certificate of Waiver or Authorization.

Airspace Waiver The term 'Airspace Authorization' means a long term authorization granted by the FAA to a specific organization or person to operate within controlled airspace. An 'Airspace Waiver' is granted with a Certificate of Waiver or Authorization.

Campus For the purposes of this policy, the term 'Campus' includes the UC Division of Agriculture and Natural Resources, and the authorities and responsibilities delegated to the Chancellors under this policy are delegated to the UC Vice President - Agriculture and Natural Resources, as appropriate and applicable.

Certificate of Waiver or Authorization The term 'Certificate of Waiver or Authorization' (COA) means an authorization issued by the Air Traffic Organization, a division of the Federal Aviation Administration (FAA), for UAS operations. A COA is filed on Form 7711.

Class The term 'Class' or 'Airspace Class' refers to the classification of airspace that are defined in terms of flight rules, and interactions between aircraft and Air Traffic Control (ATC). Classes A-E are referred to as 'controlled airspace' while Class G airspace is considered as 'uncontrolled airspace'. Controlled airspace is found in proximity to most, but not all airports.

Currency The term 'currency' means to demonstrate that one's skills and flight experience are 'current' or up-to-date. Currency may be defined with respect to a category, class or type of aircraft and is defined with respect to a specific time-interval.

Designated Local Authority A single-point of contact or committee appointed by the Chancellor, Vice Chancellors, or Deans at an individual University Location to oversee the development, implementation, and enforcement of any University Location-specific UAS related policies and procedures

Drone Colloquial or common term for an Unmanned Aircraft System.

Executive Officer The term 'Executive Officer' means any of the University of California's Chancellors, Medical Center Chief Executive Officers, Director of Lawrence Berkeley National Laboratory, and Vice President for Agriculture and Natural Resources.

Federal Aviation Administration A division of the Department of Transportation that inspects and rates civilian aircraft and pilots, enforces the rules of air safety, and installs and maintains air-navigation and traffic-control facilities.

First-Person View The term 'First-Person View' means to provide a first-person view, usually from a forward mounted camera, from the Unmanned Aircraft (UA). This provides the user to experience

the operation of the UA as if he or she was on the UA. However, due to potential blind-spots and video signal transmission reliability concerns, it may not be used as an exclusive means for maintaining Visual Line of Sight (VLOS).

Lithium Polymer Most UAS use Lithium Polymer batteries. These are now common in most electronics due to their light weight and high energy capacity. However, unlike other batteries, they need special care for charging, discharging and storage.

location-specific policy or procedure The term 'location-specific policy or procedure' means a policy or procedure, or a set of policies or procedures, established by the Designated Local Authority. The policy or procedure must include a review as described in Section 5, but may be flexible to address a diverse set of UAS activity.

Model Aircraft The term 'model aircraft' means an unmanned aircraft that is capable of sustained flight in the atmosphere, flown within visual line of sight of the person operating the aircraft, and flown for hobby or recreational purposes. See Section 15.2.1

National Airspace System The term 'National Airspace System' means the common network of U.S. airspace, including all navigable airspace from the ground up, excluding regions under military jurisdiction. The NAS additionally does not include inside of buildings or enclosed structures.

Nationwide Community-Based Organization The term 'Nationwide Community-Based Organization' means an organization that provides a comprehensive set of safety guidelines for all aspects of model aviation addressing the assembly and operation of Model Aircraft and that emphasize safe aeromodeling operations within the national airspace system and the protection and safety of individuals and property on the ground.

operator The term 'operator' means the operator of the UAS, or the person responsible for ensuring the safe operation of the UAS. The operator may also be referred to as the Remote Pilot in Command (RPIC).

overflight The term overflight means to the passage over an area in an aircraft. In many contexts, overflight is described in terms of regulatory jurisdiction.

Policy This UAS Policy issued by UCOP.

Public Agency Operation The term 'Public Agency Operation' means an operation conducted by a 'Public Aircraft' that is used for a governmental function as defined by Title 49 USC 40125(a)(2). Specific UAS activity within the UC may be eligible for PAO status. Whether an operation qualifies as a PAO is determined on a flight-by-flight basis.

Public Aircraft The term 'public aircraft' means an aircraft owned and operated by the government of a State, the District of Columbia, or a territory or possession of the United States or a political subdivision of one of these governments, except when the aircraft is operated for commercial purposes.

Recreation Use of a UAS for non-business purposes as a hobby or as part of a non-commercial community-based organization.

Regents of the University of California As defined by Section 9, Title IX of the Constitution of the State of California, the Regents of the University of California is the legal entity of the UC system.

Remote Pilot Certificate The term 'Remote Pilot Certificate' means a certificate issued by the FAA that certifies that the owner of the certificate has sufficient aerospace knowledge to operate an

UA within the National Airspace System (NAS). It may also be referred to as a 'Drone License.'

Remote Pilot in Command For the purposes of this document, the term 'Remote Pilot in Command' means the person who as the final authority and responsibility for the operation and safety of an sUAS operation. This may or may not be the person operating the UA. A person may manipulate the controls of a UA under the direct and immediate supervision of an RPIC.

Risk Level For the purposes of this document, the term 'Risk Level' refers to a simplified risk score between 1-5 that communicates an approximately level of risk; ranging from minor to severe (potential to cause injury or significant property damage).

Small Unmanned Aircraft System The term 'small unmanned aircraft system' means an unmanned aircraft weighing less than 55 lbs. and associated elements that are required to operate safely and efficiently in the national airspace system.

Systemwide Designated UAS Authority Provides expertise, support, and training for regulatory compliance, risk management, and the safe operation of UAS and sUAS across the University of California system. It also grants certain forms of approval for UAS operations in the US.

UAS activity The term 'UAS activity' refers to the act of flying. It may be used to represent a single flight or a set of flights.

UAS Advisory Board The 'UAS Advisory Board' is created by the Policy for the purposes of reviewing and developing future UAS policies.

UAS Flight Instructor The term 'UAS Flight Instructor' means a UC recognized UAS operator who is authorized to give training and endorsements for the operation of UAS for University Business. At the time of writing, there are no industry-wide endorsement that universally recognized. A UC recognized UAS Flight Instructor endorsement is valid only for UC University Business.

UAS Request Form The term 'UAS Request Form' means a documented request to operate a UAS pursuant to this Policy. The Policy does not mandate a specific form or system as long as the minimum review criteria is met. See Section 5 for further details.

UC Drones UC Drones is an online application developed by UC Risk and Safety Solutions that enables users to submit UAS requests and document UAS activity. Designated Local Authority may utilize UC Drones to review UAS activity.

University Business The official activities of a University that contribute to any one of the University's major functions of teaching, research, patient care, or public service, or to any other non-recreational University purpose.

University Location Any property or building that is owned or leased by the University where University business or activities take place.

Unmanned Aircraft The term 'unmanned aircraft' means an aircraft that is operated without the possibility of direct human intervention from within or on the aircraft. This definition includes aircraft of all sizes.

Unmanned Aircraft System The term 'unmanned aircraft system' means an unmanned aircraft and associated elements (including communication links and the components that control the unmanned aircraft) that are required for the pilot in command to operate safely and efficiently in the national airspace system. For the purposes of this Policy, this includes unmanned aircraft of all

sizes and includes unmanned aircraft operated indoors, in military airspace or in foreign airspace systems.

Visual Line of Sight The term 'visual line of sight' means that a person is able to 1) know the UA's location, 2) determine the UA's attitude, altitude and direction of flight, 3) observe the airspace for other air traffic or hazards, and 4) determine that the UA does not endanger the life or property of another.

Visual Observer The term 'Visual Observer' means a person who is designated by the RPIC to assist the RPIC and the person manipulating the flight controls of the sUAS to see and avoid other air traffic or objects aloft or on the ground.

Acronyms

AGL Above Ground Level

AMA Academy of Model Aeronautics

ATC Air Traffic Control

CFR Code of Federal Regulations

FAA Federal Aviation Administration

FPV First-Person View

LiPo Lithium Polymer

NAS National Airspace System

PAO Public Agency Operation

RPIC Remote Pilot in Command

sUAS Small Unmanned Aircraft System

UA Unmanned Aircraft

UAS Unmanned Aircraft System

UC University of California

UC ANR UC Division of Agriculture and Natural Resources

UCOP University of California, Office of the President

U.S.C. United States Code

VLOS Visual Line of Sight

VO Visual Observer