

**THE UNIVERSITY OF ALABAMA IN HUNTSVILLE**  
**UNMANNED AERIAL SYSTEMS (UAS) FLIGHT OPERATIONS POLICY**

— INTERIM —

**Number** 07.01.01

**Division** Research and Economic Development

**Date** July 6, 2016

**Purpose** This Policy establishes procedures and approval for Unmanned Aerial System (UAS) operations at UAH to ensure safe and legal flights. It provides definitions and defines permitted operations, along with delegating authority for oversight of all UAH UAS operations. This policy applies to all University employees, students, contractors or others operating UAS as a part of any University activity, or above any University property.

**Policy** The intent of this policy is to:

1. Ensure that the UAH administrative structure fully supports UAS-related operations;
2. Ensure that all flight operations are conducted safely, legally, and with the public interest in mind;
3. Reduce the hazards associated with UAS operations and prevent personal injury and property damage;
4. Reduce institutional liability;
5. Assign responsibility/authority for oversight of UAS-related operations; and,
6. Prohibit use of UAS to monitor or record areas where there is a reasonable expectation of privacy

**Implementation Responsibility:**

1. **Office of the President** – The Office of the President retains overall authority over and accountability for all UAS operations conducted at UAH and delegates specific duties and responsibilities as outlined in subparagraphs 2 and 3 below.

2. **Office of the Vice President for Research and Economic Development (OVPRED)** – The OVPRED is assigned responsibilities for the review and approval of the airworthiness of UAS platforms owned and/or operated by UAH in support of academic or research functions. The OVPRED will publish standard operating procedures for planning and coordination of UAS operations including registration, airworthiness certification, Certificate of Authorization (COA) application, execution of flights, and platform lifecycle management, in accordance with applicable FAA, UAH, and contractual policies, procedures, and requirements. The Standard Operating Procedure (SOP) will address procedures for vehicle registration, COA application, operations, training, and aviation management. The term operations includes planning, risk management, and safety as well as regular and special flight procedures and rules. Aviation management includes methods for recordkeeping and Configuration Management (CM), methods for ensuring standardization policies are executed, and defines aircrew member positions and responsibilities. Training refers to educational and certification requirements for aircrew, training resources, training methods, and verification of qualifications.
3. **Applicants** – All UAH faculty, staff, and students conducting UAS operations will coordinate UAS operations through the OVPRED's designated representative, the Director of the Rotorcraft Systems Engineering and Simulation Center (RSESC).

## **Procedures**

1. All operation and use of UAS or on or above University property must comply with FAA regulations, and local, state and federal laws regarding use of UAS. Any operation or use of UAS that violates such regulations or laws is prohibited. It is the responsibility of the operator of the UAS to ensure that all relevant UAH policies, laws and regulations are adhered to during operation of the UAS.
2. UAS operated at UAH in support of research-funded efforts require Federal Aviation Administration (FAA) registration, operation under a Certificate of Authorization (COA), and administrative compliance with this policy and the procedures developed by UAH. This applies only to

outdoor operations whether on or off campus. A fully enclosed structure, whether solid-walled, netted, or fenced is considered an indoor operation, if there is no reasonable chance the UAS could exit the structure. Indoor operations or operations inside a fully enclosed netted facility, conducted as part of research, do not require a COA or coordination with the OVPRED.

3. All airborne tethered unmanned platforms operated as part of research-funded efforts require review and approval by the OVPRED and are subject to FAA requirements and require a COA. This applies to outdoor operations whether on or off campus. This does not apply to any indoor operations.
4. The operation of all personally owned or student-organization-owned UAS on campus requires review and approval by the OVPRED. Outdoor operation of private or commercial UAS on campus is prohibited without the express written approval of the OVPRED.
5. This policy is applicable to all UAS loaned or donated to support research efforts at UAH because these platforms are treated as government-funded (public) aircraft, whether operations are on or off campus.
6. Operation of UAS on UAH property is specifically prohibited from monitoring, recording or eavesdropping on, areas such as restrooms, residential rooms, health treatment rooms, dressing rooms, daycare facilities, and similar locations that have a reasonable expectation of privacy.
7. Insurance requirements for UAS operations will be determined with the approval of the UAH Risk Manager in coordination with the University of Alabama Systems Risk Manager. A legal review will determine appropriate levels of insurance coverage needed on a case-by-case basis.
8. Student violators of the UAS policy will be subject to discipline in accordance with the UAH Code of Student Conduct. UAH employees who violate the UAS policy will be subject to employee discipline in accordance with employment policies, up to and including termination.

Users unaffiliated with UAH will be subject to trespass and other criminal prosecution for violations of this policy.

### **Acronyms and Definitions:**

1. **Certificate of Authorization** - COA is an authorization issued by the FAA's Air Traffic Organization to a public operator for a specific UAS activity. After a complete application is submitted, FAA conducts a comprehensive operational and technical review. If necessary, provisions or limitations may be imposed as part of the approval to ensure the UA can operate safely with other airspace users. In most cases, FAA will provide a formal response within 60 days from the time a completed application is submitted. UAH has access to the FAA's on-line COA System through RSESC.
2. **Public Aircraft:** An aircraft operated by a governmental entity (including Federal, State, or local governments, and the U.S. Department of Defense (DOD) and its military branches) for certain purposes as described in 49 U.S.C. §§40102(a)(41) and 40125. Public aircraft status is determined on an operation-by-operation basis. From **U.S. Code, Title 49, Subtitle VII (Aviation Programs), Part A (Air Commerce and Safety), subpart i (general) Chapter 401 (General Provisions) §40102 (Definitions), (a) General Definitions.**
3. **Public Operator:** An operator that is classified as government and/or otherwise qualifies for public aircraft operation under 49 U.S.C. §§40102(a)(41) and 40125. Not all flights by a public aircraft operator qualify as a public aircraft operation under the statute. Public aircraft operation status is not automatic for flights conducted by a government entity or a contractor to a government entity.

**Unmanned Aerial System:** The unmanned aircraft (UA) and all of the associated support equipment, control station, control and data links, telemetry, payloads, recovery equipment, communications and navigation equipment, etc., necessary to operate the unmanned aircraft. The UA is the flying portion of the system, flown by a pilot via a ground control system, or autonomously through use of an on-board computer or communication links.

**Review**

The OVPRED shall be responsible for reviewing this policy within 90 days of the policy's five-year anniversary.

APPROVAL

Mark W. Kieder 7/6/16  
Chief University Counsel Date

Christina W. Curtis 7/6/16  
Provost and Executive Vice President for Academic Affairs Date

Ryan P. ... 7/21/2016  
Senior Vice President for Administration and Finance Date

Paul Seeger 7/21/16  
Vice President for Research and Economic Development Date

APPROVED:

Robert G. Allenbush 7/25/16  
President Date