

# Unmanned Aircraft Systems

## Regulatory Environment Update

Presented to: Florida Realtors

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Federal Aviation  
Administration



# Overview

- **Public Law 112-95**
- **AC 91-57**
- **FAA Organization for UAS**
- **FAA Notice N 8900.268**
- **Exemption No. 11138 (Trudeau)**
- **14 CFR Part 107 NPRM**
- **Select web resources**



# Public Law 112-95

- **Title: FAA Modernization and Reform Act of 2012 (aka “FMRA”)**
- **Comprehensive mandate to fund, modernize FAA through FY-2015**
- **Subtitle B: Unmanned Aircraft Systems**
  - Sec 331: Definitions
  - Sec 332: Integration of UAS into NAS
  - **Sec 333: Special Rules for certain UAS**
  - Sec 336: Special Rule for Model Aircraft



# Provisions of PL 112-95

- PL 112-95 is not FAA Regulations (FAR's)
- Directs FAA to develop UAS regulations
- Due 30 Sep 2015: Final regulations for fitting UAS in US airspace safely
- Created six UAS test sites nationwide
- **Section 333 - Permits approval of certain UAS ops prior to publication of new reg's**
- Pre-exempts most model aircraft ops



# Advisory Circular AC 91-57

- Title: “Model Aircraft Operating Standards”
- 1-page document; very general and brief
- Published 9 Jun 1981
- Foundation for UAS model aircraft ops
- “Advisory” means *voluntary* compliance

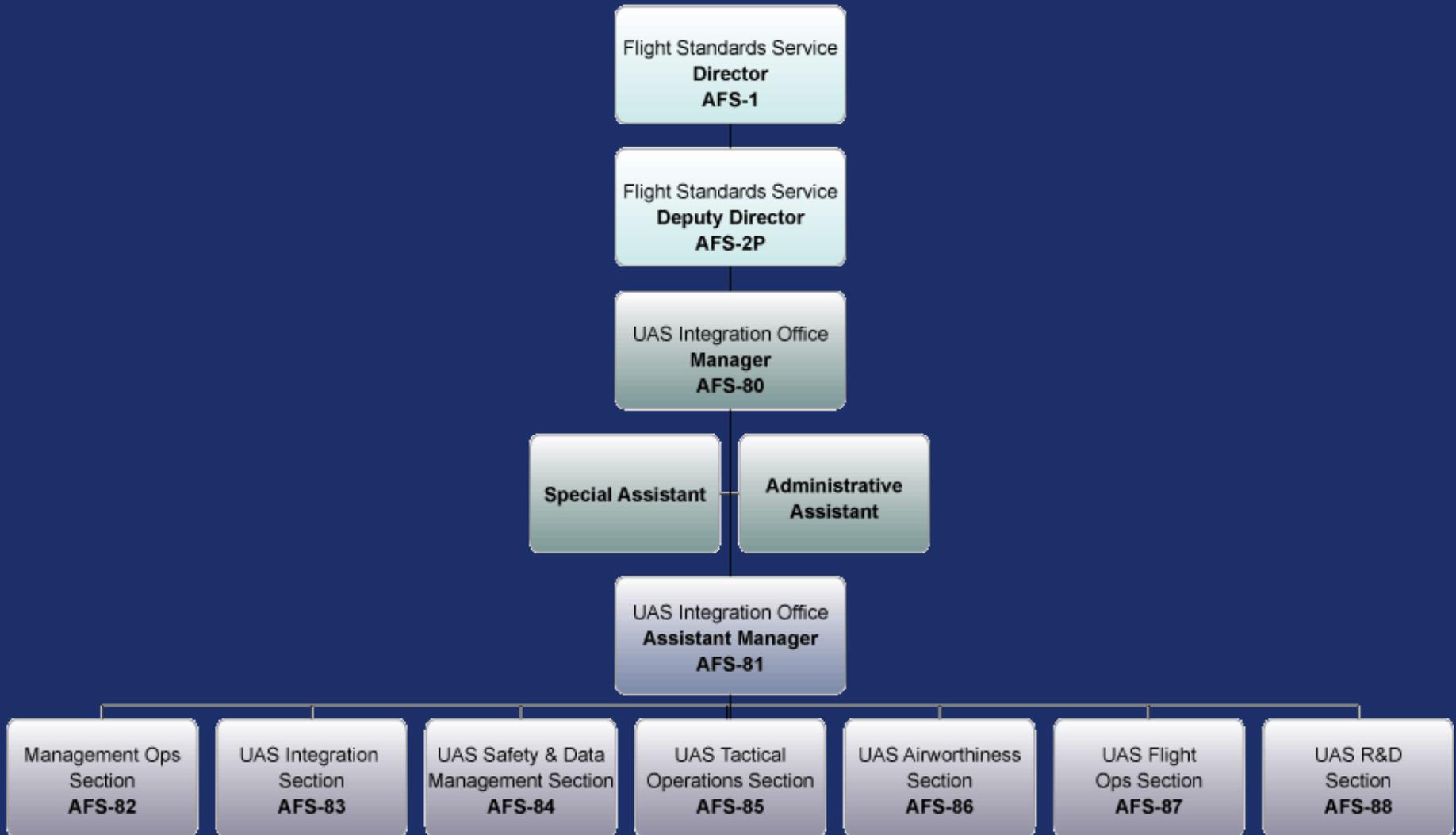


# FAA Organization for UAS

- **AFS-80: Unmanned Aircraft Systems Integration Office.**
- **Responsibilities:**
  - Regulation of UAS operations
  - Developing UAS policies & procedures
  - Ensuring safe integration of UAS into NAS



## AFS-80 Organization Chart



# Other FAA interfaces

- **Headquarters Divisions**
- **Regional AFS-220 Divisions**
- **Aircraft Certification Service**
- **Air Traffic Organization (ATO)**
- **Flight Standards District Offices (FSDO's)**



# A Look Ahead for FAA

- **Today: *Accommodation***
  - Improve FAA UAS approval guidance and process for government and civil
  - Plan/oversee research and development activities through the UAS Test Sites
  - Gather safety data
  - Grant exemptions on case-by-case basis until **Small UAS rule**
- **Mid-term: Transition to NAS Integration – *Initial***
  - Increase NAS access through small UAS rule
  - Implement advanced mitigations (Ground Based Sense and Avoid (GBSAA), others)
- **Long-term: Integration into the NAS – *Routine***
  - Amend operational regulations
  - Accomplish other rulemaking activities, as needed
  - Reduce dependency on individual approvals
  - Integration into the NextGen environment



# FAA Notice N8900.268

- **Title: Education, Compliance, and Enforcement of Unauthorized Unmanned Aircraft Systems Operators (15 July 2014)**
- **Policy guidance for FAA personnel (ASI's)**
- **Gives ex's of hobby vs. non-hobby ops**
- **Hobby / Rec ops are narrowly interpreted**
- **Commercial ops are non-hobby**
- **Real estate photo ops: non-hobby**



# Exemption No. 11138

- Exemption for UAS ops for **Real Estate**
- Approved 5 Jan 2015; Expires 31 Jan 2017
- 14<sup>th</sup> Grant of Exemption awarded by FAA
- **First for Real Estate commercial UAS ops!**
- Awarded to Douglas Trudeau of Tucson, AZ
  - Trudeau is not a certificated pilot 😊
- Can be viewed on-line: (See Resources sec)
  - **Exemption + Cert of Auth + compliance =  
“Permission”**

# Applying for the 333 Exemption: “Summary Grant”

- FAA on-line resources (see Resources sec)
- Read thru the material before applying
- Typ. less than 120-day review if based on precedent; New uses may take **much longer**
- Over 1000 grants awarded to date!
  - Streamlined approval process began 23 Mar 2015
- Can apply for amendments at later date
- Expect FAR Part 107 to obviate need for Exemptions / Summary Grants



# Select Official Web Resources

- **FAA's UAS web site**
- **Trudeau's Exemption**
- **FAA's 333 Exemption application site**
- **Aircraft registration procedures**
- **Application for Certificate of Authorization**



# FAA's UAS Web Site:

- [www.faa.gov/uas](http://www.faa.gov/uas)
- Items of general interest
- Press releases from FAA
- Links to Exemption process
- News release of Trudeau Exemption
- Part 107 (Small UAS) NPRM



# Trudeau Exemption

- [https://www.faa.gov/uas/legislative\\_programs/section\\_333/media/Trudeau\\_Douglas-11138.pdf](https://www.faa.gov/uas/legislative_programs/section_333/media/Trudeau_Douglas-11138.pdf)
- Shows Exemption in its final form
- Specifies pilot & training reqmts
- Requires drone registration (N-number)
- Mandates Certif's of Authorization (CoA's)

# FAA's 333 Exemption App Site:

- [https://www.faa.gov/uas/legislative\\_programs/section\\_333/](https://www.faa.gov/uas/legislative_programs/section_333/)
- Contains link to Trudeau, other Exemptions
- Check out the Highlights panel at right



# Aircraft Registration web site:

- Aircraft Registry web site:  
[http://www.faa.gov/licenses\\_certificates/aircraft\\_certification/aircraft\\_registry/](http://www.faa.gov/licenses_certificates/aircraft_certification/aircraft_registry/)
- **Procedural info for new registrations:**  
[http://www.faa.gov/licenses\\_certificates/aircraft\\_certification/aircraft\\_registry/media/AFS-750-94.pdf](http://www.faa.gov/licenses_certificates/aircraft_certification/aircraft_registry/media/AFS-750-94.pdf)
- Apply via **AC Form 8050-1**



# Obtaining a CoA:

- [https://www.faa.gov/about/office\\_org/headquarters\\_offices/ato/service\\_units/systemops/aaim/organizations/uas/coa/](https://www.faa.gov/about/office_org/headquarters_offices/ato/service_units/systemops/aaim/organizations/uas/coa/)
- **Grant of Exemption + CoA + compliance = “Permission”**
- **Need separate CoA for each model of drone**
- **“Blanket CoA” simplifies paperwork**

# Howgozit: Douglas Trudeau

- **First Exemption for R-E Imaging w / UAS**
  - Trudeau is not a pilot of any kind
- **Operational enhancements**
  - Notifies local law enforcement before ops
  - Notifies the neighbors before ops
- **Competition from un-approved operators**
- **Trudeau's message to this audience:**
  - Safety
  - Privacy
  - Responsibility

# FAA's Draft UAS Regulations

- **14 CFR Part 107 “Small UAS Rule”**
  - Stems from PL 112-95 mandates
- **NPRM (Draft reg's) published 15 Feb 2015**
- **Public comment period closed 24 Apr 2015**
- **AFS-80 et al have it for re-writes**
- **Promulgation of Interim Final Rule TBD**
  - Expected by Aug 2016; 16 mo after comment pd.



# 14 CFR Part 107 links:

- **Executive summary (2 pages):**

[http://www.faa.gov/regulations\\_policies/rulemaking/media/021515\\_sUAS\\_Summary.pdf](http://www.faa.gov/regulations_policies/rulemaking/media/021515_sUAS_Summary.pdf)

- **Full NPRM (195 pages):**

[https://www.faa.gov/regulations\\_policies/rulemaking/recently\\_published/media/2120-AJ60\\_NPRM\\_2-15-2015\\_joint\\_signature.pdf](https://www.faa.gov/regulations_policies/rulemaking/recently_published/media/2120-AJ60_NPRM_2-15-2015_joint_signature.pdf)

- **Public comments solicited by FAA:**

<http://www.regulations.gov/#!documentDetail;D=FAA-2015-0150-0017>

# Summary

- Real Estate UAS ops = Commercial ops
- Exemptions for Real Estate ops now being approved, and you can see on-line!
- Applicants don't have to be pilots!
  - PIC's must be rated Private or higher for now
- Grant of Exemption + CoA + compliance = **Permission** for commercial ops
- Blanket CoA for certain recurring ops
- **14 CFR 107 “Small UAS Rule” is on the way**



# Canadian conundrum!

- **Canadian Exemptions then (3 Dec 2014)...**
  - Drones under 2 Kg OK for commercial ops...
  - At least 5 NM from “built-up area”
- **Canadian Exemptions now (c16 Jan 2015)...**
  - Populated areas featuring groups of dwellings or buildings; anything larger than a farmstead should be considered a “built-up area” off limits to drones
  - **Ruling based on lack of airworthiness std's**
  - Puts significant amt of turf off limits to commercial ops
- **US rule will establish min airworthiness std's**

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# At your service today!

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