Policy Number: Interim
Policy: Unmanned Aircraft Systems (UAS)
Date Adopted:
Revision Date: January 1st, 2020
References: FAR; CFR Title 14; Part 1, 21, 45.23(b), 61.113(a) & (b); 61.133(a), 91.9(b)(2) & (c), 91.103, 91.109(a), 91.119, 91.151(a), 91.203(a) & (b), 91.405(a), 91.407(a)(1), 91.409(a)(2), 91.417(a); Public Law 112-95, Title III, Subtitle B; Title 49 U.S.C. § 40102(a)(41) and § 40125

Responsible Office: Vice President for Research and Creative Scholarship

Purpose Statement

The purpose of this policy is to ensure that the university acquires and operates Unmanned Aircraft Systems (UAS) efficiently, safely and ethically and in full compliance with all applicable federal and state rules and regulations.

Policy Statement

The Vice President for Research and Creative Scholarship (VPRCS) will be responsible for oversight of all acquisitions and operation of UAS by the University of Montana including contracted services.

This policy applies to all university faculty, staff, and students using or proposing to use UASs for official University activities or operations on/over University or non-University property.

Federal regulations require the university, and not individual faculty, staff or students, to obtain approval for operating UASs. The University requires all faculty, staff or students who wish to operate UAS for official University activities, including research, to work closely with the VPRCS through the Autonomous Aerial Systems Office (AASO) to complete the application process.

A UAS Steering Committee provides oversight, guidance and recommendations to the AASO regarding UAS acquisitions and operation. The committee is responsible for recommending policies, procedures and standards for UAS operations to AASO.

Definitions

Unmanned Aerial System (UAS): UAS describes an aircraft with no pilot on board. UASs can be remote controlled aircraft or can fly autonomously based on pre-programmed flight plans. UAS is commonly referred to as an Unmanned Aerial Vehicle (UAV) but the preferred designation Unmanned Aerial or Aircraft System (UAS) is used to reflect the fact that these complex systems include ground stations and other elements in addition to the actual air vehicles.
The Vice President for Research and Creative Scholarship (VPRCS) is responsible for providing oversight and guidance for all University UAS activities taking place on or off campus. To reduce the potential legal and risk management issues involved in managing UAS activity, all UAS use for any University of Montana activity must receive prior written approval from the VPRCS. The Office of Vice President for Research and Creative Scholarship works through the Office of Autonomous Aerial Systems (aaso@mso.umt.edu) in the review and approval process. All inquiries regarding the use of UAS shall begin with AASO via aaso@mso.umt.edu

A. Obtaining permission to use a UAS for a University activity: An approval process is in place for faculty, staff and students wishing to use UASs in official University activities. A Pre-application form which briefly describes the anticipated operation of the UAS is submitted to AASO for approval. If the operation requires a Certificate of Authorization or Waiver, the approval process is followed by a more formal application for a Certificate of Authorization from the FAA. The process is described below:

Submit the completed UAS Use Pre-Application to the AASO for approval, see Exhibit A.

AASO will review the completed UAS Use Pre-Application and communicate with the applicant within 15 working days.

B. If a Certificate of Authorization or Waiver from the Federal Aviation Administration is required the following items must be considered;

i. After the Pre-Application has been approved, faculty, staff and students wishing to use UASs in official University activities under a COA must complete the University of Montana COA/Waiver Application Requirements Form found in Exhibit B and submit the completed form to AASO for approval. Drafting the COA/Waiver application is the sole responsibility of the Director of AASO.

ii. Once the COA/Waiver request is complete the Director of Autonomous Aerial Systems will submit the application to the FAA on behalf of the University.

iii. The outcome of the FAA decision regarding the COA will be relayed to the applicable faculty and/or staff. Note that FAA approval must be obtained before use of the UAS and may take from 60 – 120 days.

iv. The VPRCS through AASO will maintain oversight for the execution of COAs/Waivers held by the University.
EXHIBIT A

University of Montana UAS Use Pre-Application

Name:
Department/Unit:
Email:
COA Operation _______ Part 107 Operation _______ Hobbyist Operation___________

Project Summary: [Briefly {one page total} describe overall project summary including small description of the UAS and concept of operation including sensors being used. In addition to the above information please address why a UAS is the “tool” of choice as opposed to other data collection vehicles (for example satellite data). This section may also include a cost-benefit analysis of manned vs unmanned aerial operations.]

Operations:
Departure Point:
Requested Project Start Date:
Requested Project End Date:
Operational Summary: [Describe the launch/recover to/from, altitudes, and details of events during flight. This is a short equivalent of a flight plan]

Class of Airspace: [A,B,C,D,E or G]
Launch/Recovery: [Description or specify type/procedure]

Required permits for operations (i.e. wilderness access, right of way access, IACUC, IRB, etc.)

Preliminary operational risk assessment (i.e. identification of protected species in the area, obstructions, etc. and a brief description of how these risks will be mitigated)

Name and Contact Info for Duly Licensed Pilot:
Name and Contact Info for visual observer:

Aircraft:
Aircraft Type and Model and weight:

For AASO use only
_____Approved _____Not Approved Signature_________________________
EXHIBIT B

University of Montana COA/Waiver Application Requirements

Name:
Department/Unit:
Email:
New COA _______ Change to existing COA _______ Request to renew COA _______

Project Summary: [Briefly {4-5 sentences} describe overall project summary including small description of the UAS and concept of operation]

Operations:
Operational Summary: [List requested altitudes, map of the flight operations area, and attach aircraft manual]

Will operations be:  Lights out? Yes/No  Visual Control? Yes/No  Instrument Control? Yes/No During the Day? Yes/No  At Night? Yes/No

Name and Contact Info for Duly Licensed Pilot:

Aircraft Manual Needs to Include:
Launch/Recovery Procedures:
Lost Link/Mission Procedures:
Lost Communications Procedures:
Emergency Procedures:
Weight:
Climb Rate (ft/min):
Descent Rate (ft/min):
Turn Rate (deg/s):
Cruise Speed (KIAS*) Minimum:  Maximum:
Approach Speed (KTS or Knot):
Operating Altitude (MSL* or FL*): Minimum:  Maximum:
Gross Takeoff Weight (Lbs):

Avionics/Equipment

Does the aircraft have a transponder onboard? Yes/No
If Transponder:
Transponder On? Yes/No  Transponder Off? Yes/No  Transponder Standby? Yes/No
Ident? Yes/No  Mode S? Yes/No  Mode C? Yes/No  Retuneable in Flight? Yes/No

Does the aircraft have a TCA/MCAS (Collision Avoidance)? Yes/No

By signing below I certify that the above statements are true to the best of my knowledge and that the COA will be used as indicated and only for non-commercial, research purposes. I also certify that any
complaint against the COA activity including any accidents or damage will immediately be reported to
the Director of AASO. I further represent, warrant and certify that at all times all applicable laws shall be
complied with:

Signature:______________________________________    Date:___________________________

Approval?

Additional Considerations

Please Note: In situations where a COA/Waiver application is being sought for airspace over land not
owned by the University, an MOU between the University and the landowner must be negotiated, or
other arrangements made, prior to the submission of the completed Pre-Application. The Office of
Legal Counsel must approve such arrangements.