

## UM Civil vs Public Aircraft Operations

Component	UM Blanket COA (Public Operations)	Part 107 (Civil Operations)
Pilot Certification Requirements	<ol style="list-style-type: none"> <li>1. Minimum qualification of remote pilot certificate</li> <li>2. Minimum Class 3 medical certificate</li> <li>3. Must be trained and qualified on the specific UAS for the conduct of the flight. (documentation must be made available showing the pilots maintain an appropriate level of recent pilot experience in the UAS being operated, or as prescribed by the operator/applicant's recurrent training and currency program.</li> </ol> <p>See FSIMS 8900.1, Volume 16, Chapter 4, Section 1, <i>Pilots</i>, dated 5/17/16</p>	<p>Pass the initial aeronautical knowledge written examination at an FAA-approved knowledge testing center (KTC). However, a person who already holds a pilot certificate issued under 14 CFR part 61 and has successfully completed a flight review in accordance with part 61 within the previous 24 months is only required to successfully complete a part 107 online training course ALC-451, Part 107 small Unmanned Aircraft Systems (sUAS), at <a href="http://www.FAASafety.gov">http://www.FAASafety.gov</a>.</p>
Operating Limitations	<p>VO(s) must be used at all times and must maintain instantaneous communication with the PIC.</p> <p>See FSIMS 8900.1, Volume 16, Chapter 4, Section 4, <i>Visual Observers and Other Personnel</i>, dated 5/17/16.</p>	<p>May use visual observer (VO) but not required</p>
	<p>File a NOTAM</p>	<p>NOTAM not required</p>
Reporting	<p>See page 6 of COA for monthly reporting requirements and Incident/Accident/Mishap Reporting</p>	<p>Accidents: <a href="https://www.faa.gov/uas/report-accident/">https://www.faa.gov/uas/report-accident/</a></p> <p>No Monthly Reporting</p>

Airworthiness	Follow UM Airworthiness procedures.	FAA airworthiness certification is not required. However, the remote pilot in command must conduct a preflight check of the small UAS to ensure that it is in a condition for safe operation.
Maintenance Requirements	Software and hardware changes should be documented as part of the normal maintenance procedures.	If there are no scheduled maintenance instructions provided by the sUAS manufacturer or component manufacturer, the operator should establish a scheduled maintenance protocol  See AC No: 107-2
	All previously flight proven systems, to include payloads, may be installed or removed as required and that activity must be recorded in the unmanned aircraft and ground control stations logbooks by persons authorized to conduct UAS maintenance	
	Any UAS that has undergone maintenance or alterations that affect the UAS operation or flight characteristics, (e.g., replacement of a flight critical component), must undergo a functional test flight prior to conducting further operations under this COA	
	The Proponent must follow the UAS manufacturer's maintenance; overhaul, replacement, inspection, and life limit requirements for the aircraft and aircraft components.	

	<p>Government entities may exercise their own internal processes regarding aircraft certification, airworthiness, pilot, aircrew, and maintenance personnel certification and training</p>	
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Additional References: FSIMS 8900.1, Volume 16 and FAA Form 7711-1 UAS COA 2016-WSA-71 (University of Montana) Final 03242016-signed.pdf

FAA recommends multiple log books divided into civil and public operations: flight time and flight history, maintenance and then each pilot should record their own flight time

**Public Aircraft Definition (AC No: 00-1.1A ):** Whether an operation qualifies as a Public Aircraft Operation (PAO) is determined on a flight-by- flight basis, under the terms of the statute. The considerations when determining PAO are aircraft ownership, the operator, the purpose of the flight, and the persons on board the aircraft.

The statute restricts PAO to those that do not have a commercial purpose. Some examples of non-commercial use (PAO) are as follows: (AC\_00-1.1B\_(4.13.12)\_(2))

1. An aircraft owned by the Government and operated by any person for purposes related to crew training, equipment development or demonstration
2. Governmental function. The term “governmental function” means an activity undertaken by a government, such as national defense, intelligence missions, firefighting, search and rescue, law enforcement (including transport of prisoners, detainees, and illegal aliens), aeronautical research, or biological or geological resource management.
3. An aircraft exclusively leased for at least 90 continuous days 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
4. **Aeronautical Research.** Aeronautical Research includes flights to measure the performance of aircraft or aeronautical components. It would include atmospheric research, meteorological observation and airborne astronomy.
5. **Biological and Geological Resource Management.** Biological and Geological Resource Management includes operations which require the use of an aircraft for the successful performance of the mission. For example, counting wildlife from and aircraft would be included

6. **Aerial Survey.** Operations conducted to assure compliance with state or local laws or codes, are included if the inability to use an aircraft would compromise the effectiveness of the mission.

**Civil Aircraft Definition (AC No: 00-1.1A):** Any operation that does not meet the statutory criteria for a PAO is a civil aircraft operation and must be conducted in accordance with all FAA regulations applicable to the operation.

Part 107 pg 61 (RIN\_2120-AJ60\_Clean\_Signed.pdf), “Under this rule, a public aircraft operation can continue to operate under a COA or can voluntarily operate as a civil aircraft in compliance with part 107. As stated in the NPRM, this rule will not apply to public aircraft operations of small UAS that are not operated as civil aircraft.”