PROCEDURES: Permitting and Operation of Unmanned Aircraft Systems (UAS)

Introduction
The following procedures implement the University’s Policy on Unmanned Aircraft Systems (UAS). Questions regarding these procedures should be directed to Office of Emergency Management at (401) 874-4974.

Flight permit requirements
Eligible individuals wishing to operate a Small UAS (sUAS) in connection with a University Related Activity, or to operate a sUAS on or over University Property, must submit a URI Small Unmanned Aircraft Systems (UAS) Flight Permit Application [insert link] to the Emergency Management Director (the Director).

Insurance requirement for non-University Affiliates
Vendors hired by the University to operate a Small UAS in conjunction with a University Related Activity, or to operate a sUAS on or over University Property are required to furnish a certificate of insurance with an aggregate coverage limit of not less than $2,000,000 and a single occurrence limit of not less than $2,000,000.

Additional permissions and permits
If a Small UAS is to be flown in conjunction with a University Related Activity over property owned by third parties (i.e. owners other than the University), the written permission of the owner on the attached Property Owner Small UAS Flight Permission form [link] must be submitted by the operator of the sUAS. NOTE: This provision is applicable to the property that is the primary subject of sUAS data collection. Permission shall not be required from abutting property owners over whose property the sUAS may pass only briefly or incidentally in the course of surveying the primary subject property.

The operator of a sUAS flight over property owned by third parties is personally responsible for determining what additional permissions or permits if any must be obtained in addition to those required by the University and for submitting evidence of those permissions to the University with the flight application. Examples include an FAA waiver for certain operations otherwise prohibited under Part 107 Rules, or permission from the FAA to operate in restricted airspace.

Flight permit process

Application submission
The Pilot-in-Command (PIC), when necessary together with an identified URI Sponsor, will apply and for obtain approval from the University (through the Director identified above) for any and all Small UAS operations they wish to perform over URI Property or in connection with any URI Related Activity they are participating in.

1. Review the planned flight operation to determine if a URI Small UAS Flight Permit is required. Any sUAS operation on or over University property, or in connection with any URI Related Activity requires a URI Small UAS Flight Permit.
2. Ensure that the planned flight operation meets URI’s Eligible Uses criteria for sUAS’s.
3. For third-party operators (those who are not University Affiliates):
a. Obtain the endorsement of a University Sponsor who will accept responsibility for compliance with the University’s Policy on Unmanned Aircraft Systems (UAS).

b. Obtain proof of liability insurance as specified above.

4. For all operators, ensure that the Pilot-In-Charge is properly licensed/certified by the Federal Aviation Administration (FAA) for the aircraft and type of operation proposed.

a. If any aspects of the flight will deviate from FAA regulations, a waiver must first be obtained and included in the application package.

5. If the planned flight will take place over property not owned by the University, complete a Property Owner Small UAS Flight Permission form and include it with the application package.

6. Complete the URI Small UAS Flight Permit Application form. This form must be filled out as an electronic PDF and submitted to the Director by the Pilot-In-Charge or the University Sponsor with required attachments as described above.

Applications must be submitted in electronic form using the PDF form provided by the University. Completed applications are submitted to the Director along with all required documentation (proof of insurance, pilot FAA certification, etc.) Prior to submission, signatures must be obtained from the URI Project Leader (URI Sponsor), dean, and department chair (as applicable).

**Application contents**

The completed application package for a sUAS operation in connection with a University Related Activity, or on or over University property, will include:

- A completed URI Small UAS Flight Permit Application, including all necessary signatures
- A copy of the Pilot-In-Charge’s FAA license/certification
- A copy of the aircraft’s FAA registration certificate
- Proof of insurance meeting University standards (if applicable)
- Copies of third party permissions/authorizations including URI Property Owner Small UAS Flight Permission forms and FAA waivers (if applicable)

**Review and approval of initial flight permit**

Once the Pilot-In-Charge has submitted a complete URI Small UAS Flight Permit Application to the Director, it will be reviewed as follows:

1. The Director will review the application for completeness and to ensure compliance with the University’s Policy on Unmanned Aircraft Systems (UAS).

2. After signing the application, the Director will forward the completed application for review by the University’s Risk Manager, the Vice President for Research and Economic Development, and the Vice President for Administration and Finance. Review will include:
   a. Identify any safety risks or conflicts with concurrent scheduled events on campus.
   b. Confirm that all insurance coverage requirements have been fulfilled.
   c. Ensure compliance with applicable research policies of the University.

3. If at any step in the review process the Application is not approved, the package will be returned to the Director with an explanation of the deficiency.

4. Once the URI Small UAS Flight Permit Application has been approved the Director will issue a URI Small UAS Flight Permit and notify the PIC and/or University Sponsor of the approval.
Flight notification

On the day of any Small UAS flight on or over URI property, and prior to launch, the PIC must file a Small UAS Flight Notification with the Department of Public Safety. The flight plan may be filed electronically at http://www.uri.edu/emergency or faxed to (401) 874-3773 using the attached form.

Amendments and addenda to flight permits

Rather than filing new permit application, a PIC may request amendment of an existing permit for the following purposes:

- To add new aircraft; and/or
- To make changes to the date and time of approved flight operations.

A request for such changes must be submitted in writing to the Director for review and approval. If the amendment(s) are approved, the Director will update the original permit accordingly and notify the PIC. Any changes other than those provided above will require a submission and approval of a new URI Small UAS Flight Permit Application.

Record Keeping

The PIC is required to maintain a permanent log of all flights conducted under a URI Small UAS Flight Permit. If the aircraft is capable of capturing individual flight times and flight path information, this flight data shall be downloaded, assigned a discrete file number, and retained by the PIC for at least one year. Flight logs and data are subject to inspection by the University at any time and must be available within twenty-four (24) hours of request.

Enforcement

The URI Department of Public Safety should be contacted at (401) 874-2121 for any imminent safety concerns involving Small UAS operations and/or in the event of an accident involving a Small UAS on URI property or in conjunction with a URI Related Activity. Otherwise, violations of this policy, including UAS operations without a permit, should be reported to the Director.

EFFECTIVE DATE: July 20, 2018
Permitting Process for UAS Flights (10/2017)

UNIVERSITY OF RHODE ISLAND