



United States Department of the Interior Office of Aviation Services

Information Bulletin

Number: 13-05
Distribution: All DOI Bureau Aviation Employees
Subject: Operation of Unmanned Aircraft Systems (UAS)

Information:

The use of Unmanned Aircraft Systems (UAS) has increased dramatically within the United States. It is important for all Bureau aviation employees to understand that the FAA considers all UAS to be aircraft subjected to the FAA's National Policy N8900.207 issued 1/22/13.

This policy identifies Unmanned Aircraft as "aircraft" flown by a "pilot" regardless of where the pilot is located. Both the aircraft and pilot must comply with FAA policy. No UAS will be flown without receiving permission in advance from the FAA through their COA (Certificate of Authorization or Waiver) (COA) process. Hobbyist and amateur model aircraft users flying remote controlled aircraft are managed under the FAA's Advisory Circular (AC) 91-57 "Model Aircraft Operating Standards." AC91-57 is not to be used as a basis of approval for the operation of aircraft for Federal, State and local governments or commercial entities.

This IB is the result of multiple reports gathered during aviation program reviews which identified unauthorized UAS flights by field personnel. It is recommended that potential users of UAS be familiar with the DOI Memorandum regarding Unmanned Aircraft Systems accompanying this Information Bulletin (IB 13-05) and the FAA's National Policy and additional UAS regulations located at <http://www.faa.gov/about/initiatives/uas/reg/>.

X

Mark Bathrick
Director, Office of Aviation Services




United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, DC 20240

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Memorandum

To: Director, National Park Service
Director, Bureau of Land Management
Director, Bureau of Indian Affairs
Director, Fish and Wildlife Service
Director, US Geological Survey
Director, Bureau of Ocean Energy Management
Director, Bureau of Safety and Environmental Enforcement
Director, Office of Surface Mining
Commissioner, Bureau of Reclamation

From: Kim A. Thorsen, Deputy Assistant Secretary for Public Safety, Resource Protection
and Emergency Services 

Subject: Unmanned Aircraft Systems

On June 21, 2012 the Department convened an Executive Aviation Summit (“Summit”) with Bureau Deputy Directors to talk about our current Departmental aviation program and potential opportunities for increasing safety, enhancing collaboration, and promoting efficiencies across all aviation programs. I think the summit was a successful first step in moving the Department’s aviation program forward.

One of the discussion topics was Unmanned Aircraft Systems (UAS), a relatively new, up and coming program seen by Summit participants as holding significant potential for safe, efficient mission execution. Participants agreed to build a Department-wide UAS program to ensure we’re following appropriate laws and regulations and creating a consistent program so as not to duplicate efforts across bureau programs; we will look to develop an action plan in the next 60 days to accomplish this. At the Summit, I relayed some key points about the UAS program that many were unaware of and stated that I would be following up with a memo to ensure executives were informed of unique aspects of UAS.

There are two key points of a UAS program. First, UAS are, by Federal Aviation Administration (FAA) definition, considered Federal aircraft; this includes hobby store remote controlled aircraft and other similar items which, when paid for with Federal funds and employed in support of Federal programs, are considered aircraft. Because UAS are considered “aircraft” Federal requirements must be followed to include specific responsibilities for acquisition approval, operational control, credentialing of operators, inventory control, cost accounting, mishap reporting, risk identification and mitigation, and activity reporting.

Second, Congress specifically limits the number of aircraft Interior is permitted to procure and maintain in its inventory. If bureaus procure aircraft, of any type including UAS, the Department is at risk of exceeding its congressionally mandated limit. We currently manage, through our Aviation Management Directorate (AMD), over 100 UAS on loan from the Department of Defense (DOD) for the purpose of test and evaluation. These are on loan due to the Congressional mandate; we are currently working with the Department's Office of Budget to adjust, through the legislative process, our allowable number of aircraft in the Department.

UAS is an exciting new asset that many bureaus are actively seeking to use. We want to work collaboratively so as to ensure we can begin testing/evaluating UAS for bureau mission execution and keep within law and regulation. In order to do so, AMD has collaborated with the bureaus, the FAA, and DOD to establish appropriate policies/protocols. They can be found at <http://amd.nbc.gov/> or the AMD Technical Services Division can be contacted at (208) 433-5077 to discuss any aspect of the UAS program, including requesting the use of the DOD loaned UAS. Additionally, the FAA requirements for obtaining Certificates of Authorization (COAs) to operate UAS outside of restricted airspace are applicable and are critical to the safe and lawful operation of UAS. No one can legally circumvent the COA requirement by declaring public aircraft status. All COA requests should be coordinated through AMD, Technical Services Division.

AMD has previously communicated this information through your bureau aviation managers and direct to the field through the attached 2011 Lesson Learned bulletin, but I wanted to be sure bureau executives were aware of this critical information. Please help in getting the word out to DOI's mission-oriented field personnel to partner with AMD in working within existing policy to meet bureau aviation mission requirements.

In order to understand the current UAS ownership across the Department, we need an inventory of UAS procured by each bureau. Please provide the following information to AMD's Technical Services Division Chief, Ralph Getchell at (208) 433-5077 or ralph_getchell@nbc.gov.

1. Systems name
2. Manufacturer
3. Weight
4. Total procurement
5. Number of airframes
6. Flight hours flown
7. Any safety incidents
8. Bureau POC currently responsible for the Bureau procured UAS

Thank you for support. Please contact me or the AMD Associate Director, Mark Bathrick (208 433-5001, mark_bathrick@nbc.gov) if you have questions or concerns.

CC:
Deputy Director, National Park Service
Deputy Director, Bureau of Land Management
Deputy Director, Bureau of Indian Affairs

Deputy Director, Fish and Wildlife Service
Deputy Director, US Geological Survey
Deputy Director, Bureau of Ocean Energy Management
Deputy Director, Bureau of Safety and Environmental Enforcement
Deputy Director, Office of Surface Mining
Deputy Commissioner, Bureau of Reclamation
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Kim Thorsen, Deputy Assistant Secretary, Public Safety, Resource Protection and
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