

# **CONNECTICUT COLLEGE UNMANNED AERIAL SYSTEMS (DRONE) POLICY**

*March 11, 2024*

Connecticut College's Unmanned Aircraft Systems ("UAS"), or Drone Policy is designed to ensure that the Conn community's use of small UAS for research, teaching and administration complies with the statutory and regulatory requirements for small UAS use and addresses the safety and privacy concerns of the Conn community and neighboring areas. UAS include all remote-controlled, autonomous and directly controlled airborne or flight-capable objects.

All small UAS use on the College campus must be to further the College's mission and activities. The use of small UAS on campus exclusively for personal purposes is prohibited. All small UAS use requires prior approval by Conn's UAS Oversight Group, pursuant to this Policy.

## **ADMINISTRATION OF POLICY**

- The administration of UAS at Connecticut College and the implementation of this Policy is the responsibility of Conn's UAS Oversight Group, which is comprised of trained representatives from the Division of Marketing and Communications and the Office of Campus Safety.
- All uses of UAS at Connecticut College require permission from the UAS Oversight Group, which has the right to deny any request for UAS use on or above College property or properties affiliated with the College.

## **SCOPE OF POLICY**

This Policy applies to:

- Any person operating a UAS on or above Conn property.
- Any Conn faculty member, employee or student operating UAS in any location as part of College-related activities.
- Any person hiring or arranging for any UAS services on behalf of the College or one of its offices, departments or programs.
- Any third party authorized by the College to conduct UAS operations on the College campus or properties (including media, contractors, consultants, etc.). Any third party wishing to operate UAS on or above College property must receive prior written authorization from the College's UAS Oversight Group for each flight.

No person under the age of 18 may operate a UAS on or above Conn property.

Conn faculty members, employees and students and any third parties who have been authorized by the UAS Oversight Group to use a small UAS on campus must comply with this Policy, any other applicable Conn policies, all applicable FAA regulations and any other relevant federal, state and local laws and regulations pertaining to the operation of UAS.

All small UAS use within the Scope of this Policy must comply with [FAA Small Unmanned Aircraft Systems Rule \(14 CFR Part 107\)](#), which regulates all use of small UAS, including “Commercial” use, or the FAA’s [Exception for Limited Recreational Operations of Unmanned Aircraft \(49 USC 44809\)](#), which provides a more limited set of regulatory requirements for “Recreational” use of small UAS. This Policy does not replicate all of the applicable FAA regulatory requirements under Part 107 and the Recreational use exception.

**Commercial use of small UAS:** The regulatory requirements of Part 107 authorize a broad spectrum of commercial and government uses for small UAS weighing less than 55 pounds. Commercial use of small UAS at Conn includes use by Conn administration or by third parties on behalf of the College, including the use of small UAS for marketing, development and alumni relations purposes.

The UAS Oversight Group may authorize commercial uses of small UAS that further the College’s mission and activities. Commercial use of small UAS must comply with all applicable regulatory requirements of Part 107.

**Recreational use of small UAS:** Under the Exception for Limited Recreational Operations of Unmanned Aircraft (49 USC 44809), a person may operate a small UAS less than 55 pounds without complying with all of the requirements of Part 107, if the small UAS is flown exclusively for “recreational purposes” and complies with all aspects of the Exception for Limited Recreational Operations of Unmanned Aircraft. Recreational purposes include operation by an institution of higher education for “educational or research purposes,” specifically “(A) instruction of students at the institution; (B) academic or research related uses of unmanned aircraft systems that have been approved by the institution, including Federal research; (C) activities undertaken by the institution as part of research projects, including research projects sponsored by the Federal Government; and (D) other academic activities approved by the institution.”

Educational and research use of small UAS requires compliance with all applicable requirements of the Exception for Limited Recreational Operations of Unmanned Aircraft or Part 107. All uses of small UAS that do not qualify for the Exception for Limited Recreational Operations of Unmanned Aircraft are considered “commercial” uses and must comply with the requirements of Part 107. Most of the Conn College campus falls within FAA restricted airspace that requires prior approval and coordination with Groton-New London Airport. Such flights are therefore ineligible for the Exception for Limited Recreational Operations of Unmanned Aircraft, must comply with Part 107 and must get approval from the Groton-New London Airport as discussed in the sections below.

The use of small UAS for purely personal purposes is prohibited, whether under Part 107 or the Exception for Limited Recreational Operations of Unmanned Aircraft.

**Use of large UAS:** UAS weighing 55 pounds or greater (“large UAS”) are ineligible to fly under the Part 107 or the Exception for Limited Recreational Operations of Unmanned Aircraft. This Policy does not cover UAS weighing 55 pounds or greater.

## **FLIGHT REQUIREMENTS AND APPROVAL PROCESS**

In addition to the requirements of Part 107 and the Exception for Limited Recreational Operations of Unmanned Aircraft, all small UAS flights must comply with Conn’s flight requirements and approval process, as described below.

### **Requirements for all small UAS flights**

- Every small UAS flight must be approved in advance by Conn’s UAS Oversight Group.
- Any small UAS operator seeking authorization for a small UAS flight must register with the UAS Oversight Group as a UAS pilot, using the **Drone/Drone Pilot Registration** Form attached as Exhibit A to this Policy.
- The operator (or the Pilot in Command for a “commercial” small UAS flight subject to Part 107 requirements) must present a flight and safety plan to UAS Oversight Group, at least seven [7] business days before the planned flight, to get approval for the flight.
- The flight and safety plan and application for approval must include:
  - Identification of the UAS and the FAA registered UAS ID number
  - Proof of UAS registration with the FAA (except for any UAS weighing less than 0.55 pounds and solely operated under the Exception for Limited Recreational Operations of Unmanned Aircraft)
  - A copy of the manual or printout of the specifications from the UAS manufacturer’s web site
  - Proof of Commercial or Personal Liability insurance meeting the requirements of this Policy
  - Registrant’s/pilot’s Conn ID card.
  - Information showing the operator’s qualifications:
    - § For flights under Part 107, include FAA Remote Pilot Certification
    - § For flights under the Exception for Limited Recreational Operations of Unmanned Aircraft, include proof of passage for the Recreational UAS Safety Test (TRUST)
  - Name and Conn ID card for UAS flight observer
  - Cell phone numbers for UAS pilot and observer
  - The proposed date, time, location and purpose of the flight
  - A description of all measures to be taken to ensure the safety of persons and property during the proposed UAS flight
  - Any data, including images or video, to be collected during the flight, consistent with this Policy’s Flight Restrictions.

- In order to obtain final approval from the UAS Oversight Group, the UAS operator must present proof of approval of the proposed UAS flight by the Groton-New London Airport, as discussed in the section below on “Restricted airspace flight approval.”
- The operator (or the Remote Pilot in Command for a “Commercial” UAS flight subject to Part 107 requirements) is also responsible for the following safety precautions:
  - Performing a pre-flight inspection, performed consistent with the FAA’s UAS Maintenance and Inspection Best Practices and with any inspection requirements of the UAS’s manufacturer, to ensure that the UAS is in safe operating condition.
  - Ensuring that any necessary approvals are in place prior to the UAS flight.
  - Ensuring that the UAS flight is conducted in compliance with FAA regulations, as well as the flight and safety plan approved by the UAS Oversight Group, and in accordance with this Policy’s Flight Restrictions listed below.
  - Ensuring that all persons involved in the operation of the UAS are informed of the flight restrictions in the flight and safety plan and are familiar with the current operating conditions and potential hazards.

**Restricted airspace flight approval by Groton-New London Airport required for flights over Conn College campus**

- Most of the Conn College campus falls within FAA restricted airspace, and all UAS flights in that airspace therefore require advance approval by the Groton-New London Airport air traffic manager. Such flights are ineligible for the Exception for Limited Recreational Operations of Unmanned Aircraft and must comply with Part 107.
- Once the UAS Oversight Group has reviewed and preliminarily approved the flight and safety plan for any proposed UAS flight, the UAS Oversight Group will authorize the operator to seek approval for the proposed flight from the Groton-New London Airport.
- Requests for approval from Groton-New London Airport can be made through the [FAA’s Drone Zone](#) application or through an app from a [Low Altitude Authorization and Notification Capability](#) (LAANC) company, such as [Aloft](#). Requests must be submitted between 90 days before and 72 hours before a planned flight.
- It is the responsibility of the UAS operator to get flight approval from the Groton-New London Airport.
- *The UAS Oversight Group will not provide final approval of any proposed UAS flight until the proposed flight has been approved by the Groton-New London Airport.*

**Additional requirements for Commercial flights under Part 107**

Commercial UAS operators must present proof to UAS Oversight Group of the following:

- That they have FAA Remote Pilot Certification in good standing, which they must agree to keep on their person during all UAS operations.
- That any UAS operated for Commercial Use weighs less than 55 lbs.
- That the UAS has not been customized or modified from the original manufacturer's specifications and condition.

### **Additional requirements for third party flights**

- Only the UAS Oversight Group may authorize a third party to conduct UAS operations at the College.
- The UAS Oversight Group will only authorize a third party to conduct UAS operations if requested and sponsored by a Conn organization, faculty member or administrator, and only if the third party is properly licensed and insured.
- It is entirely the responsibility of the third party to ensure compliance with this Policy and with the flight and safety plan approved by the UAS Oversight Group, and to take whatever precautions are needed to ensure the safety and privacy of anyone that might be affected by the UAS activity.
- To be approved by the UAS Oversight Group, any contract with a third party must:
  - Require compliance with all FAA regulations, this Policy, any other applicable Conn policies and any other applicable laws and regulations.
  - Require proof of FAA Remote Pilot Certification and FAA UAS registration, as applicable.
  - Require proof that this Policy's insurance requirements have been satisfied.
  - Provide that the third party will hold harmless and indemnify Conn against any personal injury, property damage or other loss resulting in whole or in part from the third party's UAS activity and any claim or suit seeking damages for such injury, property damage or loss.

### **Insurance requirements**

- Conn faculty members, employees and students operating UAS as part of College-related activities and in compliance with this Policy are covered by Conn's general liability insurance.
- Third parties authorized by Conn's UAS Oversight Group to conduct a UAS activity must carry their own Commercial liability insurance (CLI) or Personal liability insurance (PLI) of no less than \$1 million for UAS operations, unless the UAS Oversight Group determines that a greater amount of coverage is required.
- Third parties must provide proof of adequate insurance coverage to Conn's UAS Oversight Group, including the CLI/PLI holder name, the CLI/PLI provider, and the CLI/PLI number, and

must provide proof that the Connecticut College has been named as an additional insured on the policy.

***The UAS Oversight Group may approve, deny or require alterations to any proposed flight and safety plan.***

## **FLIGHT RESTRICTIONS**

In addition to the requirements of Part 107 and the Exception for Limited Recreational Operations of Unmanned Aircraft, all UAS flights must comply with Conn's flight restrictions, as described below.

### **Approved Fly Zones**

In addition to complying with any applicable FAA airspace restrictions, UAS may only be operated in accordance with the following requirements:

- UAS may only be operated in Conn approved fly zones under appropriate flight conditions.
- Without a written exception to this Policy from the UAS Oversight Group, UAS operation must not occur:
  - Above 400 feet.
  - Above people (e.g., passers-by, sporting events, concerts, graduation, etc.).
  - Near other persons operating equipment.
  - In areas conventionally considered private.
  - Within 25 feet of residence halls.
  - Within 25 feet of private properties abutting Conn properties unless prior written permission from the private property owner is received by the College and approved by UAS Oversight Group.
  - Near sensitive wildlife areas.
- UAS may not be operated over or near the U.S. Coast Guard Academy, the U.S. Naval Submarine Base, General Dynamics Electric Boat facility or the Millstone Nuclear Power Station without express written consent from the UAS Oversight Group.

### **Operation**

- This Policy applies to the use of UAS outside of Connecticut College property where other laws, regulations or policies may also apply, including those of the U.S. Coast Guard Academy and the Naval Submarine Base. UAS operation must fully comply with those additional laws, regulations or policies.
- UAS operators must maintain visual line of sight of the UAS during operation without obstruction or distraction and during daylight hours and good weather.
- UAS operators must monitor the orientation, altitude and speed throughout operation.

- An operator may only have one UAS in flight at a time.
- UAS operation by virtual means is prohibited on or above Conn property (e.g., pilot operating via UAS mounted video, VR headset, etc.).
- All UAS operations on or above Conn property require at least one person to act as an observer for the pilot.
  - An observer is responsible for keeping UAS operators informed of changes in the airspace and on the ground, including but not limited to approaching aircraft, vehicles, persons or wildlife; imminent changes to weather conditions; and proximity to persons, structures or hazards.
  - UAS pilots and observers must maintain constant communication with each other.
- No UAS may be operated at speeds in excess of 25 mph.

### **Safety & Privacy**

- All UAS operators must not fly a UAS carelessly or recklessly; fly in adverse weather conditions; or fly under the influence of alcohol or drugs.
- In the event of mechanical failure, unexpected adverse weather conditions or operator error, even the smallest UAS could be dangerous to persons or property on the ground if that UAS is free falling. UAS operators must take all precautions to prevent or mitigate risks to safety during UAS operation.
- All UAS operators must operate the UAS within the altitude and speed limits required by applicable FAA regulations and by this Policy to the extent it imposes stricter limits.
- All UAS operators must immediately yield, without hesitation or exception, to other larger aircraft and move to a location and altitude that will not distract or interfere with the other aircraft. Under no circumstances does a UAS have right-of-way with regard to other aircraft.
- UAS operations must not interfere with or distract the operation of ground-based vehicles, machinery or facilities.
- Any UAS that has technology capable of surveilling surrounding areas (e.g., imaging cameras, video cameras, detection and ranging systems, other data collection systems, etc.), may use that technology only with express written approval of the UAS Oversight Group as part of the approved flight and safety plan. UAS operators should assume a *right to privacy* that precludes use of surveillance and data collection technology with respect to any person or property owner from whom permission has not been expressly granted.

### **ENFORCEMENT**

- Any violations of this Policy, or other Conn policies, will be dealt with in accordance with applicable College policies and procedures.
- Sanctions may include revocation of UAS privileges or other College privileges or disciplinary actions up to and including termination or expulsion from the College as applicable.
- The College may prohibit access to College properties or resources and may pursue legal action against third parties that operate UAS in violation of this Policy.
- Fines or liabilities incurred by persons who fail to comply with this policy will be the responsibility of those persons and will not be paid by Connecticut College.

### **ACKNOWLEDGEMENT AND AGREEMENT**

By signing below, I acknowledge that the information I have provided is true and accurate to the best of my knowledge, that I have read and understand this Connecticut College Unmanned Aerial Systems (UAS) Policy, and that I agree to comply with its terms, including all applicable Federal Aviation Administration (FAA) regulations referenced therein. I understand that the College reserves the right to revoke my campus UAS flying privileges at any time.

AGREED:

\_\_\_\_\_

\_\_\_\_\_

NAME

DATE

### **EXHIBIT A**

#### **DRONE/DRONE PILOT REGISTRATION FORM**

All UAS and UAS pilots at Connecticut College must be registered. To register, you must provide requisite information below to the Division of Marketing and Communications and the Office of Campus Safety for verification before any UAS operation on or above Conn property will be approved by the UAS Oversight Group:

First and Last Name:

Conn ID number:

FAA Remote Pilot Certification (RPC):

- RPC holder first and last name:
- RPC number:



## UAS Specifications

- Make:
- Model:
- Serial Number:
- Weight:
  - Less than 0.55 lbs:
  - Between 0.55 lbs and 55 lbs:
  - 55 lbs or greater:
- FAA Registration (FAA registration is required for all small UAS, except those that are less than 0.55 lbs and flown under the Exception for Limited Recreational Operations of Unmanned Aircraft):
  - FAA registrant first and last name:
  - FAA registered drone number: