



Policy Title:

Use of Small Unmanned Aircraft Systems (sUAS) Policy

Responsible Executive(s):

Dean for Research and Executive Vice President

Responsible Office(s):

sUAS Management Team

Contact(s):

Please direct questions concerning this policy to drones@princeton.edu, or Karla Ewalt, Associate Dean for Research at kewalt@princeton.edu or 609-258-9410. More information about sUAS is available at the website drones.princeton.edu.

Effective Date: [1/16/17]

I. Policy Statement

This policy establishes an approval process and procedures to ensure safe and responsible operation of sUAS on or within University Property and off-campus in the U.S. national airspace system. Adherence to this policy ensures compliance with all applicable laws, enhances safety, and preserves the security and privacy of the members of the University community.

II. Who Is Affected By This Policy

This policy applies to any person operating or seeking to operate sUAS on or within University Property, including University Appointees, Invitees and



members of the public, or off-campus within the U.S. national airspace system by University Appointees.

III. **Definitions**

Federal Aviation Administration (FAA). U.S. government agency under the Department of Transportation, which regulates civil aviation including unmanned aircraft systems.

Invitee. An individual or entity who visits University Property, by invitation of a faculty member, staff member, or registered student organization for some purpose that benefits Princeton University, including, but not limited to, contractors/third-party operators, consultants and vendors, and public safety agencies.

No Drone Zone. An area over which unmanned aircraft are not allowed to fly.

Public Safety Agency. A federal, state or local entity that provides law enforcement, firefighting, medical, or other emergency services.

Small Unmanned Aircraft Systems (sUAS). An unmanned controlled aircraft of a weight up to 55 pounds¹, any size or design, and all associated support and control equipment, such as communications, telemetry and navigational equipment intended to fly in the national airspace system. sUAS may also be referred to as a drone or model aircraft.

sUAS Advisory Committee. A sub-committee of the University Environmental Safety and Risk Management (ESRM) Committee, who serve as advisors to the sUAS Management Team on issues pertaining to the oversight of sUAS, comprised of representatives from University offices including, but not limited to, Audit and Compliance, Dean for Research, Environmental Health and Safety,

¹ Aircraft that weigh 55 lbs or more will need to receive authorization through the FAA Section 44807 Special Authority for Certain Unmanned Systems (49 U.S.C. §44807). Contact the sUAS Management Team for more information.



Facilities, General Counsel, Public Safety, Risk Management, School of Engineering and Applied Sciences, and Procurement Services.

sUAS Operator(s). Person(s) seeking to operate the sUAS, each of whom is responsible for maintaining control of the sUAS throughout the flight.

sUAS Management Team. A group with sUAS operational management responsibility, composed of a senior representative from the Offices of the Dean for Research, Environmental Health and Safety and the Department of Public Safety.

University Appointee. Any faculty member, postdoctoral appointee, student, staff member, or any other individual with an appointment at the University, paid or unpaid.

University Property. Any land or facilities owned or leased by the University.

IV. Policy

The University recognizes that sUAS may offer significant contributions to the teaching and research endeavors of University faculty, researchers and students, and may also offer opportunities for University administrative offices in carrying out their functions. The use of sUAS, however, is regulated by law and can pose significant safety, security and privacy risks to the University community. To minimize those risks, it is the policy of the University to:

1. Ensure that the operation of sUAS complies with all applicable laws, regulations, and rules as updated or amended, including but not limited to Sections 40102(a), 40125, and 44809 of the FAA Modernization and Reform Act of 2018, the FAA Summary of Small Unmanned Aircraft Rule (Part 107), and Princeton University's sUAS Safety and Operational Standards.
2. Require that any person seeking to operate sUAS on or within University Property for any purpose must comply with the applicable procedures below in Section V.1.



3. Require that any University Appointees conducting flights off-campus for University-related research or education purposes comply with the applicable procedures below in Section V.3.
4. Authorize public safety operations for emergency missions with a defined incident perimeter, such as search and rescue or emergency response. Require that public safety operations for non-emergency purposes on or within University Property comply with the applicable procedures below in Section V.2. Public safety operations include those conducted under mutual aid and cooperative agreements with area law enforcement.
5. Establish governance for sUAS through an sUAS Management Team and sUAS Advisory Committee.

Prohibited Uses of sUAS

Many types of airspace restrictions affect sUAS flights in the United States, including prohibitions that commonly affect flights over emergency or rescue operations, stadiums and sporting events, near airports or manned aircraft, and restricted or special use airspace. In addition to any prohibited uses of sUAS established by law, the University prohibits:

1. The operation of sUAS on University Property by persons of the general public for any purpose;
2. The operation of sUAS inside of University buildings for hobby purposes;
3. The operations of sUAS on or within University Property without prior approval by the sUAS Management Team as required in this policy;
4. The operation of sUAS on or within University Property in areas of public assembly, sporting events or areas of construction without prior approval by the sUAS Management Team;
5. The use of sUAS to monitor or record areas where there is a reasonable expectation of privacy in accordance with accepted social norms and legal requirements, unless the use is in accord with an IRB-approved protocol;
6. The use of sUAS to monitor or record inside of University facilities from the outside without prior approval by the sUAS Management Team; or
7. The use of sUAS in a No Drone Zone or in any location on University Property in which there is a significant safety, security or privacy risk to the



University community as determined by the Department of Public Safety, the Office of Environmental Health and Safety, or the sUAS Management Team.

V. Procedures

1. A **University Appointee** who wishes to operate an sUAS for business, education, or hobby purposes, but not public safety purposes, must:
 - a. Submit an sUAS Flight Request form for all operations that require approval to drones@princeton.edu along with documentation of all required training, certifications and registrations;
 - i. Princeton University locations that require prior sUAS Management Team approval include all outdoor locations and all indoor public spaces, common areas, and rooms that may be reserved (e.g., atrium, hallways, classrooms, athletic facilities).
 - ii. Princeton University locations that do not require prior sUAS Management Team approval are indoor spaces, where use is otherwise permitted, that are assigned to specific faculty, staff, or students (e.g., research laboratory, office).
 - iii. Non-University locations within the U.S. national airspace system require approval when University Appointees are conducting flights for University-related research or education purposes.
 - b. Receive approval in advance from the sUAS Management Team. Approvals will specify the authorized date(s) and time(s) of operation. Additional operation times and/or locations require new form submission and approval.
 - c. Operate in a manner that preserves the safety, security and privacy of people and structural integrity of University Property and all other property at all times and in accordance with Princeton University's policies, including the sUAS Safety and Operational Standards.



2. **Public Safety Agencies** that wish to operate an sUAS for non-emergency purposes on or within University Property must receive approval, orally or in writing, from one of the following individuals: the Assistant Vice President for Public Safety, the Executive Director for Environmental Health and Safety, or their designees. Public safety operations may utilize either University Appointees or Invitees as operators. University approval is not required for emergency operations.
3. An **Invitee** who wishes to operate an sUAS for business or education, but not public safety purposes, must:
 - a. Have an sUAS Flight Request form submitted on the Invitee's behalf by the University department responsible for the Invitee while on campus, along with documentation of all required training, certifications and registrations.
 - b. Have a signed contract with Princeton University covering the operation of an sUAS on University Property that: (a) holds the University harmless from any resulting claims or harm to individuals and damage to University Property, (b) provides liability (general liability or aircraft hull liability) coverage with a \$1 million per occurrence limit, and (c) adds "Trustees of Princeton University, its officers, employees, students and agents" as an additional insured. Any modification or deviation from these insurance requirements will require review and approval by Risk Management.
 - c. Receive approval in advance from the sUAS Management Team. Approvals will specify the date(s) and time(s) of operation. Additional operation times and/or locations require new form submission and approval.
 - d. Operate in a manner that preserves the safety, security and privacy of people and structural integrity of University Property at all times and in accordance with Princeton's policies, including the sUAS Safety and Operational Standards.



- e. Obtain approval from the Office of Communications for photography and/or filming. Invitees must fill out and submit an Authorization Form to the Office of Communications.
- f. Be accompanied at all times, when the sUAS is operating, by a representative of the University department responsible for the Invitee while on campus.

To operate an **sUAS at international locations, a University Appointee** must follow all applicable regulations and laws of the host country. In some countries, the flying of sUAS is prohibited under any circumstance. A U.S. government export license may be required to ship or transport a sUAS or its payload (e.g. cameras, sensors, etc.) to a foreign country or to provide foreign persons with technology related to the item.

VI. Enforcement

Persons violating this policy will be held accountable for their actions, including:

1. Persons operating an sUAS on University Property or elsewhere, acting in a capacity on behalf of the University, in violation of any applicable federal, state, or local law or regulation or in violation of University policies may be directed to cease operation of the sUAS immediately.
2. Unauthorized sUAS Operators who are not University Appointees or Invitees may be removed from University Property, reported to local law enforcement and the FAA, and subject to other legal action by the University.
3. University Appointees will be subject to applicable University policies and procedures, which may include disciplinary actions.
4. Failure to comply with FAA regulations pertaining to sUAS may result in civil or criminal penalties under federal law.

VII. Related Documents and Forms



Princeton University sUAS Website - drones.princeton.edu

sUAS Flight Request Form - <http://drones.princeton.edu/suas-flight-request-form>

sUAS Flight Management Checklists - https://drones.princeton.edu/sites/drones/files/suas_pre-flight_checklist.pdf

sUAS Safety and Operational Standards - https://drones.princeton.edu/sites/drones/files/suas_safety_and_operational_standards.pdf

FAA Website on UAS - <https://www.faa.gov/uas/>

VIII. Roles and Responsibilities

<p><i>sUAS Management Team</i></p>	<p><i>The sUAS Management Team enforces the policy, assists with processing requests for sUAS activities consistent with applicable regulations, laws, and policies, provides policy interpretation, responds to general inquiries regarding sUAS activities, reviews and approves requests to fly sUAS on University Property or off-campus for University-related research or education purposes, and issues No Drone Zones and temporary flight restrictions of sUAS flights on University Property.</i></p>
<p><i>sUAS Advisory Committee</i></p>	<p><i>Provides advice and consultation to the sUAS Management Team on issues related to the oversight of sUAS, including policy and process development.</i></p>
<p><i>sUAS Operator</i></p>	<p><i>The operator is personally responsible for complying with FAA regulations, state and federal laws, and University policies. The operator must obtain approval in advance to fly an sUAS on campus for any outdoor location or indoor public space, common area or room that may be reserved. The operator conducting research or</i></p>



	<i>educational sUAS activities in the U.S. national airspace system must obtain approval in advance.</i>
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IX. Related Policies

Export Control Policy

Information Security Policy

Photography Authorization Form

Policy on Institutional Animal Care and Use Principal Investigator Responsibilities
(requires log in)

Policy on Obligations of the Principal Investigator for Human Subjects Research

Policy on Fines from Violations of Regulations

Rights, Rules, Responsibilities

Roof Safety Policy

U.S. Department of Energy Order: Aviation Management and Safety (DOE O 440.2C)
(applies to Princeton Plasma Physics Laboratory)

X. Update Log

Enter date and change information here.

August 11, 2017 – Updated definition of Invitee; clarified information related to invitee operations.

December 6, 2019 – Updated for FAA Reauthorization Act of 2018, off-campus locations, and public safety operations.