April 12, 2017

To: Susan Cochran  
   Chair, UCLA Academic Senate

From: Ertugrul Taciroglu  
   Chair, Undergraduate Council

Re: Draft Presidential Unmanned Aircraft System (UAS) Policy—Systemwide Review

At its April 7, 2017 meeting, the Undergraduate Council discussed the Draft Presidential Unmanned Aircraft System Policy. At this time, the Undergraduate Council has some specific concerns regarding the suggested language and oversight structure proposed in the draft that prevent us from fully endorsing the policy as it is currently articulated.

The Council agreed that it makes sense to regulate the use of UAS at UC campuses. However, it is not supportive of the proposed regulations for activities that occur off campus. Indeed, it seems prudent to have different policies and systems in place that regulate campus-based activities and field-based activities. As with many types of emergent types of technologies that are used in research, the use of UAS has outpaced their regulation. However, we hesitate to hastily create too many levels of bureaucracy that might hamper research productivity without ample reason or justification.

The use of UAS is becoming increasingly common in field research. As with any other instrument, it is often not clear if there will be a need to use UAS until researchers arrive on site and assess the situation. While researchers should, of course, comply with all local regulations, to be forced to apply for permissions before ever venturing into the field seems overly burdensome and taxing for researchers.

The Council agreed that, before it could support an oversight structure that would govern the use of UAS (both in and out of the classroom), a clearer system of approval needs to be articulated. The Council also believes that any such policy should have separate oversight structures and approval processes that govern campus use and field use. We also solicited feedback from the Department of Earth, Planetary, and Space Sciences (EPSS), which is included as an enclosure.

If you have any questions or need additional information, please do not hesitate to contact me or Eric Wells, the Undergraduate Council Analyst (ewells@senate.ucla.edu; x51194).

Enclosure: EPSS Staff Response

cc: Eric Wells, Committee Analyst, Academic Senate
Thanks for giving us a chance to weigh in. I am already on the UC UAS drone listserv so have seen these proposed regulations already and agree with them 100%, they bring accountability to the FAA regulations for UC recreational vs. commercial use, and also personal/property protection via UC insurance policies. It basically makes clear that ANY drone operations on UC property, or for UC-related business (coursework, fieldwork, promotional video etc.) must be registered with both the FAA and the UC UAS center, and that every flight must be scheduled and approved by the latter in advance.

However... The ***most*** significant piece they didn't really cover at all is the gray area for faculty/students/staff operating UAS inside and outside of a class, which is already stated in this FAA memo, but must be explicitly stated in big bold text in the UC policy:

Coursework that requires students to operate drones is considered "hobby or recreational use" and does not require FAA certification under part 107, and this includes only minimal use/assistance by the instructor as required for basic flight instruction. ALL other use for research outside of a specific course, whether by faculty, staff, or students, is considered non-hobby or recreational use because it is related to the compensated interests of the faculty/PI and thus falls under commercial drone use. This is why I got my FAA Part 107 license to build, test and operate Vassilis' magnetometer drone last summer. Students flying it eventually in EPSS 136C or as part of I99 student research would not need licensing. Any other use for research or testing would either require the faculty/staff/student get an FAA UAS license to fly, or be supervised by an FAA licensed drone pilot under Part 107 as "Remote Pilot-in-Command," who must be present during all flights and is ultimately the responsible party in an emergency or accident. This FAA training is absolutely necessary for safety reasons such as proper airspace use and aircraft collision avoidance, weather hazards, awareness of distance regulations concerning people/vehicles, equipment maintenance and recordkeeping, and contingency/emergency response. Not a job to be taken lightly or dumped on an unsuspecting student! Thus, to comply with federal rules, any EPSS drone fieldwork would need supervision by an FAA licensed drone pilot (e.g. me) or we have to start having faculty and grads/undergrads get licensed as soon as possible.

Since this is the legal boundary EPSS will be operating around, the UC draft drone policy must explain this licensing distinction clearly otherwise it leaves a can of worms for people to be cited by the FAA if they are caught flying outside of coursework, or lack liability coverage if someone gets hurt. Now, if the UC drone policy supersedes this FAA educational rule and covers all UC research drone use without need for FAA certification that needs to be spelled out clearly, but I don't think that is the case.

Emmanuel Masongsong
Project Specialist
Geomagnetic Drone Enhanced Survey Instrument Project (GEODESI)
UCLA Earth, Planetary, and Space Sciences
emasongsong@igpp.ucla.edu
310-691-9978
April 11, 2017

To: Susan Cochran, Chair
   Academic Senate

From: Michael Shin, Chair
   Committee on Instruction and Technology

Re: (Systemwide Senate Review) Draft Presidential Unmanned Aircraft System (UAS) Policy

On behalf of the Committee on Instruction and Technology (CIT), I am writing to express faculty concerns regarding the proposed policy on unmanned aircraft systems (UAS) or ‘drones.’ The following issues were raised after soliciting responses from CIT committee members as well as from colleagues whom I know are currently using drones for university-related research purposes.

The main issue with the proposed policy concerns the need to obtain approval from a ‘designated authority’ before using a drone. Who exactly said authority is, and their respective qualifications, will certainly impact overall approval. How can a single authority be qualified to assess research programs that range from climate change to vegetation succession to the deterioration of urban infrastructure to drone choreography? Moreover, one of the key advantages of using drones in research is flexibility and rapid response. How long will approval take? What is the procedure for evaluation and what are the standards for approval?

The requirement to seek university approval beyond what is already mandated by local and federal regulations (e.g., registration, no fly zones) seems unnecessarily onerous, and may, in fact, slow research efforts. It is requested that alternative methods indemnify the University be sought.

Respectfully,

Michael E. Shin, Ph.D.
Committee on Instruction and Technology, Chair
Associate Professor of Geography

cc: Susan Cochran, Chair, Academic Senate
    Leobardo F. Estrada, Immediate Past Chair, Academic Senate
    Sandra Graham, Vice Chair/Chair-Elect, Academic Senate
    Linda Mohr, Chief Administrative Officer, Academic Senate
April 4, 2017

To: Susan Cochran, Chair
   Academic Senate

From: Jessica Cattelino, Chair
   Graduate Council

Re: Draft Presidential Unmanned Aircraft Systems (UAS) Policy

At its meeting on March 17, 2017, the Graduate Council reviewed and discussed the draft Presidential Unmanned Aircraft Systems (UAS) policy. Because some graduate students use drones in preparation for their research, some members were concerned that the policy, as proposed, would make it more difficult and cumbersome for graduate students to carry out their work. Specifically, members would encourage proposers to consider how the procedures outlined will impact the timeline of graduate students’ progress towards a degree given the steps required to obtain approval for operating use. In the same vein, members questioned whether the draft policy would be a new level of red tape or yet another hurdle to cross, rather than serve its articulated purpose of creating minimum standards for the safe use and operation of UAS and Small Unmanned Aircraft Systems.

Thank you for the opportunity to review and comment.

cc: Estrella Arciba, Graduate Council Analyst, Academic Senate
    Linda Mohr, CAO, Academic Senate
March 30, 2017

Susan Cochran  
Chair, UCLA Academic Senate

Re: Systemwide Review: Draft Presidential Unmanned Aircraft System Policy

Dear Professor Cochran,

Thank you for providing the Council on Research (COR) with an opportunity to comment on the Draft Presidential Unmanned Aircraft System Policy. The Council discussed the policy at its meeting on March 15, 2017.

No major issues were identified with the policy. The objective seems reasonable due to the non-violation of privacy. One member noted that there is no mention of consequences, should there be failure to comply with the rules, and recommended including an explanation of the liability.

Thank you for the opportunity to review the proposed policy. If you have any questions for us, please do not hesitate to contact me at lhavton@mednet.ucla.edu or via the Council’s analyst, Elizabeth Feller, at efeller@senate.ucla.edu or x62470.

Sincerely,

Leif Havton, Chair  
Council on Research

cc: Leobardo Estrada, Past Chair, Academic Senate  
    Elizabeth Feller, Analyst, Council on Research  
    Sandra Graham, Vice Chair, Academic Senate  
    Linda Mohr, Chief Administrative Officer, Academic Senate  
    Members of the Council on Research
April 12, 2017

To: Susan Cochran, Chair  
Academic Senate

From: Albert Courey, Chair  
Committee on Teaching

Re: (Systemwide Senate Review) Draft Presidential Unmanned Aircraft System (UAS) Policy

COT received the request for comment on Draft Presidential Unmanned Aircraft System (UAS) Policy. COT has no comment on the proposed changes.

We thank you for the opportunity to opine.

cc: Susan Cochran, Chair, Academic Senate  
Leobardo F. Estrada, Immediate Past Chair, Academic Senate  
Sandra Graham, Vice Chair/Chair-Elect, Academic Senate  
Linda Mohr, Chief Administrative Officer, Academic Senate
March 21, 2017

To: Susan Cochran, Chair
   Academic Senate

From: Lothar von Falkenhausen, Chair
   Committee on International Education

Re: (Systemwide Senate Review) Draft Presidential Unmanned Aircraft System (UAS) Policy

CIE received the request for comment on Draft Presidential Unmanned Aircraft System (UAS) Policy. CIE has no comment on the proposed changes.

We thank you for the opportunity to opine.

cc: Susan Cochran, Chair, Academic Senate
    Leobardo F. Estrada, Immediate Past Chair, Academic Senate
    Sandra Graham, Vice Chair/Chair-Elect, Academic Senate
    Linda Mohr, Chief Administrative Officer, Academic Senate
Sorry.

The Academic Freedom Committee has no response to this draft policy.

Marian

From: Mohr, Linda
Sent: Thursday, April 13, 2017 11:55 AM
To: Olivas, Marian <molivas@senate.ucla.edu>
Subject: FW: (Systemwide Senate Review) Draft Presidential Unmanned Aircraft System (UAS) Policy

Marian,

Do you have AF’s response?

Thx, Linda

From: Mohr, Linda
Sent: Friday, March 10, 2017 10:47 AM
To: Kreiman, Jody E. <jkreiman@ucla.edu>; Shin, Michael E. <shinm@geog.ucla.edu>; Von Falkenhausen, Lothar <lothar@humnet.ucla.edu>; Havton, Leif A. <lhavton@mednet.ucla.edu>; Courey, Albert J. <courey@chem.ucla.edu>; Cattelino, Jessica <jesscatt@anthro.ucla.edu>; Taciroglu, Ertugrul <etacir@ucla.edu>
Cc: Arciba, Estrella <earciba@senate.ucla.edu>; Feller, Elizabeth <efeller@senate.ucla.edu>; Jados, Christopher <cjados@senate.ucla.edu>; Malmquist, Eric <emalmquist@senate.ucla.edu>; Olivas, Marian <molivas@senate.ucla.edu>; Rouzan-Kay, Renee <rrouzankay@senate.ucla.edu>; Speights, Annie <aspeights@senate.ucla.edu>; Wells, Eric <ewells@senate.ucla.edu>; Leung, King <kleung@senate.ucla.edu>
Subject: FW: (Systemwide Senate Review) Draft Presidential Unmanned Aircraft System (UAS) Policy

Committee on Academic Freedom
Committee on Instruction & Technology
Committee on International Education
Council on Research
Committee on Teaching
Graduate Council
Undergraduate Council

Dear Professors,

The Office of the President invites comments on the Draft Presidential Unmanned Aircraft System (UAS) Policy. The proposed policy is posted on the Senate website at:

In order to formulate the campus response, we ask that committees submit comments no later than April 12, 2017, so that the Executive Board may review responses at its meeting on April 20 and prepare the UCLA Senate response. Please address your response to Senate Chair Susan Cochran and copy Executive Assistant Chris Jados at cjados@senate.ucla.edu.