

MPAA UNMANNED AIRCRAFT SYSTEMS (UAS) EXEMPTION SUMMARY

INTRODUCTION

In September 2014, the Federal Aviation Administration (FAA) granted regulatory exemptions to selected companies to operate Unmanned Aircraft Systems (UAS) on scripted, closed-set, motion picture and television productions under specific, outdoor conditions within the United States.

This summary has been developed to provide guidance for all outdoor UAS operations, including when the UAS is flown as a prop.

I. REQUIREMENTS PRIOR TO OPERATION

All UAS vendor companies must possess a current, FAA-approved UAS Motion Picture and Television Operations Manual (Manual) and must obtain an Air Traffic Organization-issued Certificate of Waiver or Authorization (COA) prior to conducting any UAS operation.

FAA regulations require that the UAS vendor company utilize a qualified Pilot in Command (PIC) and a Visual Observer (VO) for each UAS in operation.

The PIC must have on set with them at all times all pertinent documentation, which includes, but is not limited to: the Manual; the COA; Plan Of Activities; pilot certificate; and third-class medical certificate. These documents must be made available to both the Production Company and to regulatory agencies upon request.

The UAS vendor company must request a Notice to Airman (NOTAM) between 48 and 72 hours prior to UAS operation.

The FAA must approve the flight plan and may limit UAS operations near non-towered airports or controlled airspace.

Before conducting UAS operations, the PIC must ensure that the radio frequency spectrum used for the operation and control of the UAS complies with the Federal Communications Commission (FCC) or other appropriate government-agency requirements and does not conflict with any radio frequencies used by production.

Authorities Having Jurisdiction (AHJ) may have their own requirements regarding UAS operations.

A safety meeting should be conducted with all affected production personnel prior to UAS operations.

II. OPERATION AND SAFETY

The UAS must weigh less than 55 pounds (25 Kg), including energy source(s) and attached equipment.

The UAS may not be flown at a ground speed exceeding 50 knots (approximately 57 MPH).

Each UAS operation must be completed within 30 minutes flight time or with 25% battery power remaining, whichever occurs first.

If the UAS loses communications or its Global Positioning System (GPS) signal, the UAS must return to a pre-determined location within the security perimeter and land or be recovered in accordance with the Manual.

The UAS must be operated within Visual Line Of Sight (VLOS) of the PIC at all times. This requires the PIC to use human vision unaided by any device other than corrective lenses. The VO may be used to satisfy the VLOS requirement, as long as the PIC always maintains VLOS capability and the VO and PIC can communicate verbally at all times.

The UAS cannot be operated by the PIC from any moving device or vehicle.

Flights must be operated at an altitude of no more than 400 feet above ground level.

The UAS always must remain clear of, and yield the right of way to, all other manned operations and activities (e.g., ultralight vehicles, parachute activities, parasailing activities, and hang gliders).

UAS operations may not be conducted during night.

Prior to each flight, the PIC must assess the weather conditions and inspect the UAS to ensure that the conditions

are safe for UAS operation. If the inspection reveals a condition that would affect the safe operation of the UAS, the aircraft is prohibited from operating until the weather conditions have improved and/or the necessary maintenance has been performed to allow for a safe flight.

The PIC must abort the UAS operation in the event of unpredicted obstacles or emergencies.

The UAS vendor company must report to the FAA UAS Integration Office within 24 hours any: 1) incident, 2) accident, or 3) flight operation that transgresses the lateral or vertical boundary of the COA-defined operational area.

The UAS vendor company also must report all accidents to the National Transportation Safety Board.

Further flight operations may not be conducted until the incident, accident, or boundary transgression is reviewed and authorization to resume operations is provided.

III. DISTANCE REQUIREMENTS

The UAS may not be operated directly over any person, except for authorized and consenting production personnel, who must be essential to the closed-set production operation.

The distance between the UAS and authorized and consenting production personnel shall be determined by the Manual.

All non-authorized or non-consenting persons (e.g., spectators, observers, general public, news media) are prohibited within 500 feet of the UAS operation area. This distance may be reduced to no less than 200 feet if it would not adversely affect safety and the FAA has approved.

IV. NOTIFICATION

The Production Company must notify all production personnel of the planned use of UAS so that any objection can be communicated prior to UAS operation.

Notification can be accomplished by including a statement like the following on the call sheet:

“An Unmanned Aircraft System (UAS) will be used in close proximity to production personnel and equipment. Any personnel who does not consent to working within the UAS area must notify _____ [please insert the assigned production designee(s)] prior to use of the UAS.”

V. ADDITIONAL INFORMATION

For more information on the FAA and UAS:
<http://www.faa.gov/about/initiatives/uas/>

To view the FAA's Grants of Exemption:
https://www.faa.gov/uas/legislative_programs/section_333/

