

# Connecticut College Unmanned Aircraft System (Drone) Policy

This Policy requires that all unmanned aircraft system (drone) flights above Connecticut College property and all drone flights as part of College-related activities in any location comply with FAA regulations and this Policy in all respects. Connecticut College is committed to compliance with FAA regulations and all federal, state and local laws, in all respects.

Nearly the entire campus and surrounding areas are within controlled airspace and are subject to strict FAA requirements due to the proximity of Groton Airport, the Naval Sub Base in New London, General Dynamics Electric Boat in Groton and naval vessels located in the Thames River. Failure to comply with FAA regulations may result in serious penalties.

Under this Policy, no member of the Conn College community may conduct any drone flight over College property, or any flight as part of College-related activities in any location, without first getting all necessary approvals from the FAA and receiving clearance from the College's UAS Oversight Group. If you initiate a drone flight without prior approval or otherwise violate this Policy, you are subject to discipline up to and including termination or expulsion from the College.

The UAS Oversight Group will only approve flight requests for College-related activities. Flights for purely personal purposes are strictly prohibited.



### CONNECTICUT COLLEGE UNMANNED AIRCRAFT SYSTEM (DRONE) POLICY

Updated Oct. 23, 2024

### **OVERVIEW**

This Policy provides the rules for flying UAS (drones) above College property or flying drones for College-related activities in any location. All such UAS flights must comply with FAA regulations and this Policy in all respects. Violation of the Policy may result in **disciplinary actions**, up to and including termination or expulsion from the College.

Before initiating any flight above College property or for College-related activities in any location, drone operators must take the following steps:

- 1. Read this Policy in its entirety.
- 2. Use the FAA Unmanned Aircraft Systems website (available here: <u>https://www.faa.gov/uas</u>) and/or FAA regulations to:
  - a. Determine whether you are flying for recreational/educational purposes or commercial purposes;
  - b. Learn or confirm that no changes have been made to the relevant FAA rules;
  - c. Complete all steps required by the FAA for drone flights, including (but not limited to) completing any necessary FAA-required certification or training courses, registering your drone with the FAA, and understanding the FAA rules regarding where you can fly a drone;
  - d. Develop a flight plan that complies with all FAA and other relevant federal, state, and local laws
- 3. If you are flying in a controlled airspace, which includes the entire College campus, the adjacent portion of the Thames River, and the entire area within approximately four nautical miles of the Groton Airport, you must request and obtain FAA approval for your flight through an FAA-approved Low Altitude Authorization and Notification Capability (LAANC) provider. See the FAA UAS Data map for additional information about controlled airspace.
- 4. Submit a detailed flight request to the UAS Oversight Group. Do not proceed until you receive approval or denial from the UAS Oversight Group.
- 5. If your flight is approved by the UAS Oversight Group (and the FAA if necessary), you must check all NOTAMs (notices to airmen) and weather conditions and abide by all airspace restrictions before flying. In addition, it is your responsibility to understand and operate your drone in compliance with all FAA regulations, including (but not limited to) restrictions based on maximum altitudes, permitted times of day, operations over people and restrictions on flight locations. The FAA posts active UAS-related NOTAMs on the FAA website.

Please be aware of the following notable restrictions on flights over or near the College campus. This list is not exhaustive and flight maps change over time. It is your responsibility to know where you can fly under FAA regulations.



- The entire College campus and surrounding area are within the <u>Groton Airport UAS Facility</u> Map. As a result, all flights on or above the College campus require prior FAA approval through the LAANC app.
- Naval Sub Base New London and General Dynamics Electric Boat Groton are subject to a National Security UAS Flight Restriction. Flights over or adjacent to these facilities are prohibited and require coordination with the U.S. Navy and FAA, through the UAS Oversight Group. See the Groton Airport UAS Facility Map for details.
- The FAA prohibits UAS flights within 3,000 feet laterally of a U.S. Navy vessel. The USS Nautilus
  is permanently stationed on the East bank of the Thames River, directly across from the College
  campus, and other U.S. Navy vessels may be stationed on the East bank of the Thames River,
  directly north of the College campus. As a result, any flights over the Thames River and any
  flights that may come within 3,000 feet of a U.S. Navy vessel require prior coordination
  with the U.S. Navy and FAA, through the UAS Oversight Group.



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# 1. STATEMENT OF POLICY

Connecticut College is committed to compliance with FAA regulations and all federal, state, and local laws.

The College has issued this Unmanned Aircraft Systems Policy to ensure that the College community's use of UAS for research, instruction and administration complies with all statutory and regulatory requirements for UAS use and addresses the safety and privacy concerns of the Conn community and neighboring areas.

# 2. ADMINISTRATION OF POLICY

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

# 3. SCOPE OF POLICY

This Policy applies to:

- Any person operating a UAS on or above Conn property.
- Any Conn 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.



### 4. COMPLIANCE WITH FAA REGULATIONS

All small UAS use within the scope of this Policy must comply with all applicable FAA regulations – either the FAA Small Unmanned Aircraft Systems Rule (14 CFR Part 107), which regulates all small UAS use, 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 (i.e., flights for educational or research purposes for the College). This Policy highlights certain requirements under Part 107 and the Recreational Use Exception, but does not replicate all of the applicable FAA regulatory requirements for the operation of small UAS. It is your responsibility to familiarize yourself and comply with all FAA regulations and other applicable federal, state, and local laws.

<u>Commercial use of small UAS</u>: 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, goals 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 weighing 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 Part 107. All uses of Part 107.

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 is not permitted under this Policy:** 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 large UAS.

**Examples**: The table below provides examples of proposed uses of small UAS on campus and whether they would be considered commercial uses, educational/recreational uses or prohibited uses.



CONNECTICUT COLLEGE

Category	Examples
Commercial Uses (Part 107)	<ul> <li>* Administration use of small UAS for marketing materials.</li> <li>* Administration use of small UAS to map College campus.</li> <li>* Approved third-party use of small UAS to film promotional material for College.</li> </ul>
Educational/Recreational Uses (Exception for Limited Recreational Operations)	<ul> <li>* Use of small UAS by Conn professor teaching Earth Science course to provide instruction on geology on and around College campus.</li> <li>* Use of small UAS by Conn student to research air speeds at altitudes below 400 feet for a College course.</li> <li>* Use of small UAS by Conn professor in furtherance of environmental research project sponsored by the Federal Government.</li> </ul>
Prohibited Uses	<ul> <li>* Student, employee or third party use of small UAS for personal enjoyment on campus.</li> <li>* Any use of large UAS (greater than or equal to 55 pounds) on College campus or for College-related purposes. (Not governed by this Policy.)</li> </ul>

**FAA Controlled Airspace and UAS Facility Maps**. Be aware that the airspace over and around the College's campus is "controlled airspace" that is subject to heightened FAA regulation. For reference, the FAA maintains <u>UAS Facility Maps</u> that show the maximum altitudes around airports where the FAA may authorize Part 107 UAS operations without additional safety analysis.

In order to fly a small UAS in controlled airspace (Class B, C, D or surface area E), an educational/recreational or commercial user must request an airspace authorization from the FAA prior to flight, either through a LAANC application or through the FAA's Drone Zone. LAANC automates the application and approval process for airspace authorizations.

All small UAS operators should be aware of the following FAA controlled airspace over or near the College campus:

- The entire College campus and surrounding area are within the <u>Groton Airport UAS Facility</u> Map. As a result, all flights on or above the College campus require prior FAA approval through the LAANC app.
- Naval Sub Base in New London and General Dynamics Electric Boat in Groton are subject to a National Security UAS Flight Restriction. Flights over or adjacent to these facilities are prohibited and require approval from the U.S. Navy and FAA, which must be sought in coordination with the UAS Oversight Group. See the <u>Groton Airport UAS Facility Map</u> for details.
- The FAA has issued special security instructions that prohibit UAS flights within 3,000 feet (0.5682 miles) laterally of a U.S. Navy vessel. The USS Nautilus is permanently stationed on the East bank of the Thames River, directly across from the College campus, and other U.S. Navy vessels may be stationed on the East bank of the Thames River, directly north of the College campus. **Any flights over the Thames River and any flights that may come within 3,000 feet**



# of a U.S. Navy vessel require prior coordination with the U.S. Navy and FAA, through the UAS Oversight Group.

**Other applicable rules and regulations**. This Policy applies to the use of small UAS outside of Connecticut College property for College-related purposes. Such flights may be subject to other laws, regulations, or policies that are not described in detail here. UAS operations must fully comply with those additional laws, regulations or policies, and UAS operators are solely responsible for compliance.

### 5. <u>CONNECTICUT COLLEGE FLIGHT REQUIREMENTS AND UAS OVERSIGHT GROUP</u> <u>APPROVAL PROCESS</u>

In addition to all FAA rules, regulations and requirements and all federal, state and local laws, all small UAS flights must comply with the College's flight requirements and approval process, as described below.

### Conn College requirements for all small UAS flights

- Every small UAS flight must be approved in advance by Conn's UAS Oversight Group.
  - Before each flight, the small UAS operator must present a flight approval request to the UAS Oversight Group using the <u>Drone Flight Request Form</u>. No flights may occur unless and until the UAS Oversight Group approves a flight request. To avoid delays, the UAS Oversight Group recommends submitting a request at least five (5) business days before the scheduled flight time.
- In all cases, a small UAS operator is also responsible for complying with the following pre-flight and in-flight requirements:
  - 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 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.
  - All operators must check NOTAMs and weather conditions and abide by all airspace restrictions before flying.



### Conn College 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 FAA regulations and all applicable federal, state and local laws. The third party must comply with this Policy and with the flight and safety plan approved by the UAS Oversight Group, and 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.
  - Present proof of FAA Remote Pilot Certification and FAA UAS registration, as applicable.
  - Present proof that this Policy's insurance requirements have been satisfied.
  - Enter into an agreement with the College providing 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 on a primary basis.
- The UAS Oversight Group may approve, deny or require alterations to any proposed flight and safety plan.

### 6. FLIGHT RESTRICTIONS

All flights must comply with FAA regulations and any applicable federal, state and local laws. <u>In addition</u>, all UAS flights must comply with Conn's flight restrictions, as described below.



**Approved Fly Zones**: UAS flights within the scope of this Policy 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 (and from the FAA as necessary), UAS operation must not occur:
  - Above 400 feet.
  - Above people (e.g., passers-by, sporting events, concerts, graduation, etc.).
- Without a written exception to this Policy from the UAS Oversight Group, UAS operation must not occur:
  - 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. Naval Submarine Base, U.S. Coast Guard Academy, General Dynamics Electric Boat, the Millstone Nuclear Power Station, or any other security sensitive locations without approval from the required government entities, in coordination with the UAS Oversight Group.
- UAS may not be operated within 3,000 feet laterally of any U.S. Navy vessel (including the USS Nautilus, which is located on the East side of the Thames River directly across from the College campus), without approval from the required government entities, in coordination with the UAS Oversight Group.

**Operation**: UAS flights within the scope of this policy may only be operated in accordance with the following requirements:

- 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.



o 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.

o 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 all manned aircraft and move to a location and altitude that will not distract or interfere with the manned aircraft. Under no circumstances does a UAS have right-of-way with regard to manned 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.

### 7. 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.

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