

SPECIAL OPERATIONS

UNMANNED AIRCRAFT SYSTEM

Purpose: This policy aims to establish procedures for the safe operation of small Unmanned Aircraft Systems within the City of North Little Rock.

Policy Statement: The department has implemented the operation of small Unmanned Aircraft System(s) (sUAS) to assist during special events, emergencies, and special operations by providing an aerial visual perspective, as well as offering direction for public safety events, traffic incident management, and perimeter security. They will also be implemented to help combat crimes in specific, identifiable areas, enhance situational awareness and increase officer safety. This policy sets forth the guidelines according to the Federal Aviation Administration (FAA) for aircraft operation during specified missions and procedures to minimize the risk to people, property, and aircraft while safeguarding civil liberties and privacy of all persons.

Summary of Changes: Information added regarding privacy, Civil Rights/Civil Liberties, accountability, and transparency.

Definitions:

Small Unmanned Aircraft System (sUAS): The sUAS is a remotely piloted aircraft weighing less than 55 pounds.

sUAS Administrator: The sUAS Administrator has full oversight responsibility for all logistical and administrative elements of sUAS operations. The administrator is responsible for reviewing and approving operational missions.

Team Commander: The individual responsible for assisting the sUAS Administrator with administrative functions related to the sUAS program. The Team Commander is also responsible for the operational readiness, oversight of all aircraft maintenance, and approval of operational missions.

Assistant Team Commander: The Assistant Team Commander is responsible for assisting the Team Commander in their duties.

Pilot in Command (PIC): The individual responsible for the overall flight operations of a specific mission.

Visual Observer (VO): The individual trained to maintain the line-of-sight and 360-degree hazard awareness around the sUAS at all times and assist the PIC in carrying out all duties required for the safe operation of the aircraft.

Camera Operator: The individual responsible for operating all camera functions during sUAS operations.

Defined Incident Perimeter: A location identified has a defined perimeter based on the scope of the operation and a specified operational ceiling at or below 400 feet Above Ground Level (AGL).

Public COA: A Certificate of Waiver or Authorization (COA) issued by the FAA allows governmental operations of sUAS within the National Airspace System (NAS) within the boundaries of a public aircraft, not for hire or hire compensation. All personnel involved in sUAS flight operations must read and comply with the contents of the COA and its provisions.

Procedure:

1. Aircraft

1.1 General Airworthiness – The Team Commander shall ensure that all sUAS utilized by the department are maintained and flight-ready according to the manufacturer's recommendations and related industry standards. In addition, members will operate the aircraft in compliance with all documents and provisions referenced in the COA.

1.2 Software and hardware changes - Members shall document all changes in the Drone Sense web-based flight log software. In addition, test flights must be conducted and reported after significant changes in the hardware or software.

- 1.3 The PIC shall ensure that the aircraft is airworthy before each mission. The PIC may rely upon the inspection and reports provided by the Team Commander. The PIC or observer shall perform a preflight and post-flight inspection of the aircraft. Any equipment issues shall be entered into the notes section within the DroneSense web-based flight log software and promptly reported to the Team Commander via department email. It shall be the responsibility of the Team Commander to determine whether the reported issues need to be corrected before the next flight.
- 1.4 Storage for Transport - The aircraft shall be stored securely to limit possible damage to the unit while in transit. Any damage occurring during transport should be reported to the Team Commander for inspection.
- 1.5 Battery Charge - Any components necessitating a charged battery shall be charged following the manufacturer's recommendations. In addition, batteries should be inspected regularly for signs of damage, such as swelling, and immediately removed from use if the damage is discovered.
 - 1.5.1 The Team Commander will collect all damaged batteries to be destroyed.

2. Pilots

- 2.1 The PIC is the person who has final authority and responsibility for the operation and safety of flight. The PIC can be designated before or during the flight. Only personnel trained and licensed in the aircraft operation will be authorized to conduct flight operations. The PIC position may rotate duties as necessary with equally qualified pilots. The individual designated as PIC may change during flight; however, the PIC can only command one aircraft at a time.
- 2.2 All pilots flying department aircraft shall be appropriately trained and hold an FAA Unmanned Aerial System Pilot Certification. Initial training for this certification will be conducted through an NLRPD Internal Training Program to include a working knowledge of the airspace intended for operations, Air Traffic Control and Notice to Airman (NOTAM) communication requirements, and the ability to obtain and interpret weather data.

3. Visual Observers

- 3.1 VO's are required for all mission flights of an sUAS.
- 3.2 The role of the VO is to see and avoid other aircraft and the ability to identify the position for purposes of relaying reports to the PIC.
- 3.3 VO's will participate in all preflight briefings.

4. Camera Operator

- 4.1 The Camera Operator will receive specific training on camera equipment operations, including recording and storing digital data for evidentiary purposes, before assisting with mission flights. The Camera Operator shall store all photo or video recordings according to departmental evidence handling procedures.
- 4.2 Camera Operators will participate in all preflight briefings.

5. Flight Conditions

- 5.1 The PIC is responsible for obtaining a current weather report from Aeroweather.com.
- 5.2 All flights shall be conducted at or below 400 feet Above Ground Level (AGL) unless otherwise noted in the COA, approved by the LR ATC, or following the guidance provided on the NLRPD UAS flight map located in the sUAS server folder.
- 5.3 Members shall conduct all aircraft operations within line of sight of the PIC or observer. The pilot or observer may detect and avoid other aircraft or property hazards.
- 5.4 Members shall conduct flight operations during daylight unless the necessity of the mission requires flying at night. Night flight is authorized in the NLRPD COA when the aircraft is equipped with additional lighting.
- 5.5 Members will not operate the aircraft in sustained winds greater than 21 knots (24 mph) or in adverse weather that would affect the line of sight and VFR weather minimum requirements.

6. Mission Requirements

- 6.1 Requests for sUAS support for a scheduled or emergency mission shall be forwarded to the sUAS Administrator, Team Commander, or Assistant Team Commander.
- 6.2 Once the mission has been approved, the PIC, VO, and Camera Operator (if applicable) will be designated.
- 6.3 A preflight briefing will be held before aircraft launch and will cover the following:
 - 6.3.1 Review of mission goals and methods to achieve goals, including handoff procedures;
 - 6.3.2 Review of current and forecasted weather conditions and weather limitations;
 - 6.3.3 Contents of the applicable COA;
 - 6.3.4 Review of current Notice to Airmen (NOTAMs) and Temporary Flight Restrictions (TFRs) that have been issued for the proposed flight area;
 - 6.3.5 Radio frequencies to be used;
 - 6.3.6 Identification of any mission limitations and safety issues such as radio or microwave interference;
 - 6.3.7 Review of proposed flight grid, including maximum ceiling as determined by air space location as shown on the NLRPD UAS flight map;
 - 6.3.8 Review of communication procedures between PIC, observer, camera operator, and other ground support, including the availability of two cell phones to communicate with Air Traffic Control in the event of a fly-away or other flight emergency;
 - 6.3.9 Review of emergency/contingency procedures, including aircraft system failure, flight termination, and lost link procedures;
 - 6.3.10 Review of required video or digital images;
 - 6.3.11 Execution of the preflight check following the approved checklist.
- 6.4 All mutual aid requests will be forwarded to the Team Commander, or the Assistant Team Commander in their absence, for initial approval.
 - 6.4.1 The Team Commander will notify the on-duty patrol commander of the request.
 - 6.4.2 The Team Commander will notify the Team Administrator of the request and final approval to deploy any team members.

7. Flight Operation Requirements

- 7.1 All operations will be on a case-by-case basis.
- 7.2 Before operations, the PIC or designee must notify the National Notice to Airman (NOTAM) facility at (877) 487-6867 and provide the following:
 - 7.2.1 Agency Name,
 - 7.2.2 Name of the pilot in command and contact number,
 - 7.2.3 The latitude/longitude coordinates and the radius of the flight for the defined operations area, along with the mean sea level (MSL) altitude.
 - 7.2.4 The altitude at which the member will fly the mission.
 - 7.2.5 The closest airport by three-letter designation:
 - 7.2.5.1 Little Rock: LIT
 - 7.2.5.2 North Little Rock: ORK
 - 7.2.5.3 Carlisle: 4M3
 - 7.2.5.4 Conway: CXW
 - 7.2.5.5 Benton: SUZ
 - 7.2.6 Lastly, members will provide the duration of the mission.
- 7.3 Members will not conduct sUAS operations within a 1/2 mile radius of non-controlled airports or heliports without attempting to notify landing or departing air traffic in the area via UNICOM frequencies.
- 7.4 If a review of NOTAMs during preflight briefings reveals another agency sUAS operating in all, or part, of the intended operating area, the NLRPD must de-conflict the intended operational area from the active working site by contacting that agency. Contact information may be obtained from the affected air traffic control facility if not otherwise known.

7.5 Notice to Airmen (NOTAM) Requirement - A distance (D) Notice to Airmen shall be issued 48 to 72 hours before normal unmanned aircraft operations are conducted. Due to the immediacy of some tactical operations, the NOTAM may be filed 30 minutes before operations. Suppose the necessary use of the aircraft is immediate. In that case, the NOTAM does not have to be filed, but the circumstances justifying the reason for not filing the NOTAM must be documented.

8. Communication Requirements

- 8.1 The primary communication method preferred by NOTAM and LR ATC with the PIC is via cell phone. However, if LR ATC needs to move or suspend sUAS operations. In that case, the responsible authority will relay instructions directly to the PIC. Therefore, an additional cell phone must be available as a backup, along with an aviation radio tuned to the LR ATC frequency (118.7) that will be monitored during each sUAS operation.
- 8.2 LR ATC must be immediately notified in the event of any emergency that would impact safety or operations.

9. Night Operations

- 9.1 sUAS night operations are those operations that occur between the end of evening civil twilight and the beginning of morning civil twilight, as published in the American Air Almanac, converted to local time. (Note: this is equal to approximately 30 minutes after sunset until 30 minutes before sunrise).
- 9.2 Observers will be positioned in appropriate locations during all flight operations.
- 9.3 Binoculars, night vision devices, etc., may not be used as the primary means for visual observation duties. Such devices are permitted only for augmentation of the observer's visual capability. Visual observers must use caution to ensure the aircraft remains within a visible line of sight.

10. Data Reporting/Privacy/Civil Rights/Civil Liberties

- 10.1 Documentation of all operations associated with sUAS activities is required monthly. The documentation will consist of data provided in each DroneSense entry. The Team Commander is responsible for the monthly report.
- 10.2 The PIC will complete an NLRPD UAS After Action Review (AAR) for each scheduled or emergency mission, including all mutual aid missions. Upon completion, the NLRPD UAS AAR will be forwarded to the Team Commander, forwarding the report to the Team Administrator.
- 10.3 Data collected during UAS/sUAS operations will be used consistent with and relevant to the authorized purpose(s).
- 10.4 Data collected during UAS/sUAS-operations that are not maintained in a records system covered by the Privacy Act shall not be disseminated unless required by law or fulfills an authorized purpose and complies with established requirements.
- 10.5 Information collected by UAS/sUAS that contains PII shall not be retained for more than 180 days. Exceptions will include whether the information is necessary for an authorized mission or an ongoing investigation by the NLRPD. This information will be maintained in a system of records covered by the Privacy Act.
- 10.6 sUAS-recorded data will not be collected, disseminated, or retained solely for monitoring activities protected by the U.S. Constitution, such as the First Amendment's freedom of religion, speech, press, assembly, and grievances (e.g., protests, demonstrations).
- 10.7 Collection, use, dissemination, or retention of sUAS-recorded data should not be based solely on individual characteristics (e.g., race, ethnicity, national origin, sexual orientation, gender identity, religion, age, or gender), which is a violation of the law.
- 10.8 The North Little Rock Police Department will receive, investigate, and address potential complaints or issues involving privacy, civil rights, and civil liberties received from the public regarding the use of the grant-funded UAS/sUAS following the North Little Rock Police Department Professional Standards Policy Directive 04-02 (Professional Standards Complaints).
- 10.9 Only team members with the approval of the department's IT manager will be granted access to any systems containing personally identifiable information (PII).

- 10.9.1 Any misuse of data that is being, or has already been, collected (including any PII) by a team member will be investigated by the Team Commander, Assistant Team Commander, and the Team Administrator to determine if departmental policies have been violated. In addition, the Chief of Police will direct the Professional Standards Unit to conduct an internal investigation to obtain additional information if substantiated.
- 10.10 All collected data (to include PII) will have oversight provided by the department's IT manager to ensure all applicable laws, regulations, and policies are being met.

11. Incident/Accident/Mishap Reporting

- 11.1 Any incident, accident, or mishap will be reported as outlined in section D3 of the COA for the NLRPD.

12. Aircraft Maintenance and Pilot Log Books

- 12.1 DroneSense is a comprehensive web-based tool allowing sUAS pilots to fly their aircraft and maintain flight logs. It will enable the operations section to broadcast the live streaming of real-time video of incidents. In addition, it allows administrators to keep a record of training and mission flights as well as pilot flight and equipment maintenance logs.
 - 12.1.1 Aircraft name and identification number, piloting time, conditions and flight location, and mission description are captured and logged in the DroneSense program.
 - 12.1.2 Members shall document aircraft and component maintenance in DroneSense to include monthly inspections.

13. Prohibited Acts/Accountability

- 13.1 Members shall not operate department aircraft in violation of the Arkansas and United States constitutions, statutes, or regulations. When a search warrant is required by law, and no warrant exception exists, the flight is prohibited unless a search warrant signed by an authorized magistrate is obtained.
- 13.2 Department aircraft are to be used only for mission-specific duties.
- 13.3 Members shall not fly department aircraft in conditions that exceed the manufacturer's recommended limitations, including range, ceiling, wind strength, and battery charge.
- 13.4 Members shall not fly department aircraft for any mission where the Team Commander or the PIC determines the risk of flying the aircraft outweighs the benefit to the mission. The Team Commander cannot countermand a PIC's determination not to fly a mission. However, the Team Commander can countermand a PIC's decision to fly a mission. The PIC has sole accountability for the aircraft during flight operations.
- 13.5 Members will fly no department aircraft for personal reasons or hired by any person or entity.
- 13.6 Spraying or dropping anything from the aircraft is prohibited.
- 13.7 The sUAS Administrator will be responsible for closely monitoring accountability with team members for compliance with this policy. Violations of the policy should be addressed immediately.

14. Training

- 14.1 Upon completing the FAA Remote Pilot exam, pilots will be trained in mission-specific operations and the systems and roles involved in conducting a mission according to the COA.
 - 14.1.1 All pilots must have a minimum of three qualifying flights on each model of sUAS owned by the department, including three manual take-offs and landings in the last sixty (60) days, to be eligible to fly a mission.
 - 14.1.2. Recurrent training is administered on the FAA.gov website and is not limited to actual pilot/observer skills but includes knowledge of all pertinent sUAS and aviation matters and crew resource management.
 - 14.1.3 All unit members shall read the current COA and maintain their operator/observer proficiency.
 - 14.1.4 Failure to maintain or prove proficiency may result in removal from the sUAS Unit.
- 14.2 Unit training will be conducted one day a month in a four-hour instruction block.
 - 14.2.1 Unit members will maintain a yearly training calendar to schedule all training within and outside this agency.
 - 14.2.2 Each team member will be assigned a class responsible for researching and presenting the material during the team's monthly training event.

15. Transparency

- 15.1 A review of this policy will be conducted at least once every three years by the North Little Rock sUAS Team Administrator, Team Commander, and Assist Team Commander to review and update the latest laws and guidelines.
- 15.2 The NLRPD sUAS Team Commander is responsible for the annual review of this policy with all team members and will continue to monitor team activities throughout the year. In addition, the Team Commander will schedule this review on the yearly training calendar. Failure to adhere to this policy will result in removal from the sUAS team.
- 15.3 The citizens of North Little Rock will have access to sUAS team information via the department website, media releases provided by the Public Information Officer (PIO), social media, and public events, such as job fairs and community outreach events.
- 15.4 sUAS use during public events will be announced on the department website through media releases and social media whenever applicable and accessible.
- 15.5 sUAS operations and team information, including statistical data, are provided in the department's annual report published and for public viewing.

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