Florida Atlantic University
Drone Tiers, Registration and Flight Requests

Frequently Asked Questions

PROCEDURE & FORMS FAQs

1. **Why is FAU updating its drone procedures?**
   FAU's updated drone program is in response to the State's new regulation, 60GG-2.0075 Unmanned Aerial Systems (UAS) Minimum Security Requirements, F.A.C., which is designed to protect state agencies from technological espionage related to Foreign Countries of Concern and drone technology.

2. **What is the Tier Classification worksheet?**
   This is document #1 in our drone package. Before the university can approve a drone for purchase and/or use, FAU is now required by the State to ensure it's a compliant device. The Tier Classification worksheet is an assessment completed by the individual wishing to purchase/build a drone to determine if it's allowed based upon the new State guidance. The assigned Tier also identifies the specific standard precautions required to operate the drone in a compliant fashion. The Tier classifications are as follows:
   a. *Research Exception if your research is focused on the drone itself (hardware/software) and at the direction of a State or Federal agency to conduct the research;*
   b. *Tier One is a drone that does not collect, transmit or receive any data during flight;*
   c. *Tier Two is a drone capable of collecting, transmitting or receiving only flight control data, excluding visual and auditory data; and,*
   d. *Tier Three is a drone that is capable of collecting, transmitting or receiving any data, including visual and auditory data. Thus, anyone using a drone to collect audio and/or visual data as part of a research project would be a Tier Three.*

3. **What is the Drone Manufactures Verification form?**
   This is document #2 in our drone package. The Drone Manufacture Verification form is a document the drone purchaser would send to the manufacture/3rd party vendor to validate the device against the State's regulatory language. This also serves as a request for the manufacture/3rd party vendor to send back to the FAU purchaser supporting documentation on the device (spec sheet, operator's manual, etc.) to verify their responses. Once the Tier Classification Worksheet and Drone Manufacture verification are completed, please send the two forms and any attachments/supporting documentation from the manufacture/3rd party vendor to ehs@fau.edu for review/approval.

4. **What is the Drone Registration form?**
   This is document #3 in our drone package. After your drone has been approved and purchased, submit the registration form and copies of the Part 107 license for each person who may pilot the drone to ehs@fau.edu.

5. **What is the Drone Flight Request form?**
   This is document #4 in our drone package. Please complete and submit this form to ehs@fau.edu prior to each drone flight. Approval from Environmental Health & Safety (EH&S) must be received prior to the flight activity.

6. **If I'm building a drone from individual parts, what do I need to consider in terms of the Tier Worksheet and standard precautions?**
   If you're building a drone from individual parts, you still need to identify the Tier classification of your drone once its completed. If your drone is Tier Two or Three, you'll need to ensure critical components were not manufactured in a Country of Concern in addition to the required standard precautions and Tier Two/Three requirements. Please see the definition section for more information on critical components.

7. **What can I do with a drone we've previously purchased but now cannot fly due to the new regulation (example: DJI drones)?**
   In the event that your current drone is ineligible to fly due to its country of origin or another disqualifier, you have two options. First, you can submit your current drone for trade-in value with your vendor as part of a new, compliant drone purchase. Evidence of the trade-in on the sales form must be submitted to the FAU Property Department <u>after</u> the transaction is complete. Second, you can sell your non-compliant drone but the sale must be <u>pre-approved</u> by FAU Property.

DRONE TECHNOLOGY FAQs

8. **If my drone connects to the internet for the purposes of command and control, what steps should I take to make the connection secured and monitored?**

   One of the following will need to be done:

   1. *Contact the information Security team (security@fau.edu) to build an isolated network for the control computer. The computer will need to stay in this network and would no longer be allowed to connect to the main FAU network. Lead time for this setup may take several days; **<u>or</u>***
   2. *Utilize a dedicated computer for controlling the drone that utilizes cellular or consumer internet service providers. This computer will not be allowed to connect to the FAU network.*

9. **If my drone connects to the internet for the purposes of command and control, what steps should I take to isolate it from the FAU network where university data is held?**
   The device would have to connect to a cellular network through a hotspot or a network provider other than FAU such as AT&T or Comcast.

10. **If my drone connects to a computer or FAU network, how would I isolate the drone and/or its software to prevent access to any network where FAU data is held?**
    The device cannot connect to the FAU network. An isolated network or storage location must be established for storing the data for the drone. Contact the information Security team (security@fau.edu) to build an isolated network.

11. **If my drone or its software connects to a computer or FAU network and uses removable memory, how would I isolate that process to prevent access to any network where FAU data is held?**
    The device cannot connect to the FAU network. An isolated network or storage location must be established for storing the data for the drone. Contact the information Security team (security@fau.edu) to build an isolated network.

12. **If the data from my isolated network is transferred to a network where FAU data is held, how would I:**
    - **Conduct an initial scan using antivirus or anti-malware software on the computer that connected directly or indirectly to the drone?**
    - **Use antivirus and anti-malware software during the data transfer?**
    - **Scan the destination of the transferred data using antivirus and anti-malware software for malicious code?**

    Data may be transferred to a Windows computer on the FAU network as long as the data is copied to removable storage first. These steps must be followed:

    1. *The destination computer must be running Windows and a part of the Windows Active Directory domain. Please reach out to your IT group or the helpdesk to verify.*
    2. *The destination computer must not reside in a network dedicated for servers, or be a VDI session. Please reach out to your IT group or the helpdesk to verify.*
    3. *The files are automatically checked for malware upon access.*

13. **How do I determine if my drone utilizes a Federal Information Process Standard (FIPS) 140-2 compliant encryption algorithm?**
    The manufacturer will need to provide documentation confirming compliance.

DEFINITIONS

Critical Component	Drone component related to: flight controllers, radio, data transmission devices, cameras, gimbals, ground control systems, operating software (including cell phone or tablet applications, but not cell phone or tablet operating systems), network connectivity, or data storage. Critical Components do not include, for example, passive electronics such as resistors, and non-data transmitting motors, batteries, and wiring.
Data	All documents, papers, letters, maps, books, tapes, photographs, films, sound recordings, data processing software, or other material, regardless of the physical form, characteristics, or means of transmission, made or received pursuant to law or ordinance or in connection with the transaction of official business by any agency.
Drone	A powered, aerial vehicle that: Does not carry a human operator; Uses aerodynamic forces to provide vehicle lift; Can fly autonomously or be piloted remotely; Can be expendable or recoverable; and Can carry a lethal or nonlethal payload.
Foreign Country of Concern	This term means the People's Republic of China, the Russian Federation, the Islamic Republic of Iran, the Democratic People's Republic of Korea, the Republic of Cuba, the Venezuelan regime of Nicolás Maduro, or the Syrian Arab Republic, including any agency of or any other entity under significant control of such foreign country of concern.
Instructional Technology	An interactive device used by a School that assists in instructing a class or a group of students and includes the necessary hardware and software to operate the interactive device. The term also includes support systems in which an interactive device may mount and is not required to be affixed to the facilities.
Open Data	Data that is structured in a way that enables the Data to be fully discoverable and usable by the public. The term does not include Data that are restricted from public disclosure based on federal or state laws and regulations, including, but not limited to, those related to privacy, confidentiality, security, personal health, business or trade secret information, and exemptions from state public records laws; or Data for which a Governmental Agency is statutorily authorized to assess a fee for its distribution.

Research & Accountability Purposes	Drone use by a Florida College System Institution or a State University in direct support of research on Drone hardware, operating systems, software, communications systems and protocols, components, and data practices for the purpose of understanding the existence and extent of potential threats and vulnerabilities, and mitigations thereto. This research must be conducted at the direction of a state of Florida agency or a federal agency, or a party contracted by a state of Florida agency or a federal agency to conduct the research.
Approved Manufactures	A Governmental Agency may only use a Drone from a manufacturer that meets the minimum security requirements specified in this rule. A manufacturer that meets such requirements is deemed an approved manufacturer for the given tier as specified in subsection (3). Notwithstanding a manufacturer's designation as an approved manufacturer, the Governmental Agency is still required to ensure that the Drone it intends to use complies with all applicable provisions of this rule.