This information is provided as a courtesy to public safety entities looking to get operational with Unmanned Aircraft Systems (UAS), and is a compilation based on many conversations the FAA Public Safety team has had with successful and highly reputable UAS practitioners. The information here is provided as an aid to public safety entities looking to get operational with drones; to help them understand what to do to operate safely in the National Airspace System. **This information shall not be construed as official FAA guidance, regulations, or policy, which are contained in other official documents.** References in this paper to Civil Rules will only pertain to 14 CFR Part 107, which applies to civil UAS weighing less than 55 pounds. There are other civil rules that apply for different UAS based on weight or other purpose (Exemptions, Special Airworthiness Certificate, Type Certificate, Part 137 for Agricultural Aircraft Operations, HAZMAT carriage, or Recreational flying for example) but are not discussed here because most entities are flying UAS less than 55 pounds. There are significant requirements to fly as an Agricultural Aircraft Operator if the operator intends to carry or spray chemicals (economic poisons see 14 CFR 137.3) and other hazardous materials (see 49 USC 171.8), and these other rules apply to public and civil aircraft. Those rules are not discussed here.

UAS rules and practices are evolving every day and change often. Check back often to [www.faa.gov/uas](http://www.faa.gov/uas) for the most current information pertaining to UAS operations.

**The Legal Frameworks of the Flight Rules**

Some public entities have two legal frameworks available to them to operate a UAS in the National Airspace System (NAS). Those that meet the definition of a Public Aircraft and who fly qualified missions (per the Statutes 49 USC 40102(a)(41) and 49 USC 40125) (herein referred to as “the Statutes”) can fly a mission either as: a) a civil operator under 14 Code of Federal Regulation (CFR) Part 107 or b) as a Public Aircraft Operator. The proper legal framework to fly a mission is determined on a per mission basis. There is no requirement by the FAA to fly as a Public Aircraft Operator (PAO) if the entity qualifies as a Public Aircraft. Under current US law, many volunteer fire departments and 501(3)(c) organizations are not eligible for public aircraft status, however, because they don’t meet the Statutory definition of a Public Aircraft (see 49 USC 40102(a)(41)), and they must only fly under the civil rules, i.e. Part 107.

**The Federal Aviation Regulations.**

The Federal Aviation regulations are best understood in terms of Airmen certifications, Airspace authorizations, and Aircraft airworthiness.

**Airmen**

**Individual Pilot Responsibility**

No matter which legal framework the department flies a mission under, and irrespective of how others may view them, it is important to understand that the FAA considers people flying UAS to be aviators, flying aircraft, and operating in the National Airspace System (NAS). **The Remote Pilot in Command (RPIC), no matter which legal framework they operate under, “is directly responsible for, and is the final authority as to, the operation of that aircraft (see 14 CFR 91.3 for PAO, and 14 CFR 107.19 for civil Part 107).**” The NAS is a shared airspace, and it requires knowledgeable and compliant aviators to maintain a high degree of safety and efficiency for all parties, both in the air and on the ground.
Pilot Certification.

Due to the nature of missions flown by public entities, a pilot certification is required. Under the civil rules, small UAS pilots flying under Part 107 must obtain a Part 107 Remote Pilot certificate and maintain recency of aeronautical knowledge. Under the public statutes, public aircraft operators self-certify their pilots. The Public Aircraft Operator (the entity) is responsible for pilot selection, training, and performance of anyone who flies missions for them. Self-certification does not mean, “no certification”. It means the public aircraft operator must train and document their UAS pilots to an equivalent FAA level of a Part 107 certificate at a minimum (and may be asked to prove it in a FAA investigation or surveillance). Under PAO, oversight responsibility shifts in large part from the FAA to the Public Aircraft Operator, although the FAA may conduct surveillance of PAO.

Public Aircraft Operators are cautioned that many missions do not qualify for Public Aircraft status, and those missions that are not qualified PAO missions (see 49 USC 40125) are governed by the civil rules, which means that pilot must possess a Part 107 certificate and maintain aeronautical knowledge recency every 24 calendar months to be in compliance with Part 107.65.

Many public aircraft manned aviation units tell us they require any pilot applicants to possess a FAA certificate as a minimum qualification to apply for a position, even though this is not required. They tell us they do this for a few reasons: 1) to filter out the uncommitted, 2) to assure that everyone flying for the unit has a common and fundamental level of required aviation knowledge upon which they conduct mission specific training and development, and 3) very importantly, not every mission they are asked to fly can be flown as a Public Aircraft, and therefore a FAA pilot certificate is required to fly those missions. This policy seems to fit well with unmanned aviation units as well, but ultimately the decision about pilot certification is up to the COA holder, their leadership, and risk management.

Airspace

All US airspace is regulated by the FAA and the Federal government has sovereignty over that airspace per US law (49 U.S.C. §40103(a)(1)). The US airspace is the outdoor space from the ground up to space. The FAA does not regulate indoor flights. The airspace is generally divided into “controlled” airspace, and “uncontrolled airspace.” Controlled airspace is airspace of defined dimensions within which Air Traffic Control services are provided to manned aircraft. Controlled airspace is further divided into different classifications. The level of control varies with different classes of airspace.

Airspace Authorizations.

All UAS operations, whether flown under Part 107 or under the Public legal framework, must have a written and prior airspace authorization to fly in controlled airspace. For Public Aircraft Operations, a Certificate of Waiver/Authorization (COA) is required. Most PAO fly under a “Blanket” COA in Class G airspace. To regularly fly under a COA in controlled airspace, a “Jurisdictional” COA is needed. Under Part 107, Class G airspace authorization is granted to the operator in the regulation. To operate in controlled airspace, a Low Altitude Advance Notification Capability (LAANC) authorization or DroneZone authorization is required. See JO 7200.23A for the procedure that both the local Air Traffic Control Tower and the operator must follow to obtain that authorization. More detailed information about COAs are later in this paper.
Emergency Operations

Special Governmental Interest (aka SGI or e-COA) Emergency Operation Process. In cases of emergency where a PAO or Part 107 operator cannot fully comply with their existing COA or Part 107 (as applicable), they can request an emergency, temporary amendment to an existing COA (if flying as a PAO) or Part 107 regulation (if flying as a civil operator), or obtain a temporary, emergency airspace authorization for a limited period of time at specific locations.

See [https://www.faa.gov/uas/getting_started/emergency_approval/](https://www.faa.gov/uas/getting_started/emergency_approval/) for more information about the appropriate situations, the process, and the checklist the FAA Systems Operation Security Center (SOSC) will want completed before you reach out to them at (202) 267-8276, and 9-ator-hq-sosc@faa.gov. Email is the preferred initial contact after completing and sending the checklist found on the link above.

Aircraft

UAS are considered aircraft per US law (49 U.S.C. §40102(a)(6) and PL 112-95 §331).

UAS Registration.

All UAS flown under Part 107 or as a Public Aircraft must be registered with the FAA, irrespective of weight. This requirement applies to government entities. To register your UAS, go to the FAA DroneZone: [https://faadronezone.faa.gov/#/](https://faadronezone.faa.gov/#/) and follow the Part 107 Dashboard even if registering a UAS for public aircraft operations. Currently public entities must also pay the nominal registration fee and each UAS must have a unique registration. Registration is done on DroneZone in the same way a Part 107 aircraft is registered. You will need a serial number of a major component of the machine, or check “serial number not applicable” to complete the UAS registration process. One of the RPICs should register on the site as a user, then select the Part 107 Dashboard, Manage sUAS Inventory, Add UAS to register each UAS. Please be aware that you will not be able to complete the COA online program until your unmanned aircraft is registered.

Airworthiness.

All aircraft flying in the NAS must be airworthy. Under Part 107.15, the Remote Pilot in Command is responsible for ensuring the UAS is airworthy. Under the Public Statutes, the Public Aircraft Operator is responsible for certifying that their UAS is airworthy. An airworthiness statement will be required when a Public Aircraft Operator applies for a COA.

Part 107 vs Public Aircraft Operations.

The FAA Public Safety team is often asked “which is the better framework to operate UAS under for a qualified entity?” The answer is that it depends on many factors and can only be determined by the entity itself. Successful UAS Public Safety practitioners tell us they recommend that the decision as to under which legal framework to operate certain missions is best made only after discussions with the entity’s leadership, legal, and risk management. The decision to operate as a Public Aircraft carries significant legal and risk implications that should not be undertaken lightly. Oversight responsibility shifts from the FAA to the Public Aircraft Operator under the Public Statutes.
For qualified (per the Statutes) entities, we hear from successful practitioners that some major benefits to operating as a Public Aircraft are the ability to operate at night, to conduct limited operations over human beings in life safety situations, and the ability to do mutual aid under a Blanket COA anywhere in Class G airspace in the NAS. The downside is more work is required up front to develop a robust program that ensures and documents pilot selection, qualification, and recurrent training, as well as maintenance of their aircraft. PAO COAs currently require a Notice to Airmen (NOTAM) be filed prior to flight. A monthly report is also required under PAO. Neither of these actions are required for Part 107 operations. Compensation nullifies PAO, unless the cost reimbursement is a transfer of money from equivalent entities within a particular locality or State (see AC 00-1.1B for more info). As the Low Altitude Advance Notification Coordination (LAANC) System rolls out to more and more facilities, obtaining a controlled airspace authorization could be easier under Part 107 since LAANC is currently not applicable to PAO. Under Part 107, the entity will need to obtain a waiver to 107.29 to fly at night, for example. There are pros and cons for either and only the entity can decide what legal framework is best for them.

How to Get Started as a Civil (Part 107) Operator.
First, get all remote pilots Part 107 certificated. Second, as previously mentioned in this document, register your UAS on DroneZone (https://www.faa.gov/dronezone/) . Third, apply for any waivers the department may need on DroneZone, paying very close attention to the “how” and “procedures” in the Waiver Safety Explanation Guidelines. Under Part 107, the RPIC must comply with all the conditions and provisions of Part 107 unless written waivers are granted by the FAA for those regulations they want relief from. A waiver to Part 107.29 Daylight Operations, for example, is required to fly at night under Part 107, even for public safety. There are minimum visibility and cloud ceiling requirements in Part 107 that must be complied with, even for public safety. Operations over human beings, or beyond visual line of sight is not permitted without a waiver, and those waivers are rarely granted except in emergency situations. Waivers can take up to 90 days to process, so plan accordingly.

How to Get Started as a Public Aircraft.
First review the Statutes Title 49 United States Code (USC) section (§) 40102(a)(41)(c) or (d) and 49 USC § 40125(b) to see if your department qualifies for Public Aircraft status. Second, read thru Advisory Circular 00-1.1B (or subsequent revisions) Public Aircraft Operations for more guidance about PAO. See this link for the most current Advisory Circulars: https://www.faa.gov/regulations_policies/advisory_circulars/ Third, have a conversation with your legal and risk management departments to make sure they are comfortable with the risks and responsibilities associated with operating as a Public Aircraft. There are also numerous legal interpretations available on the FAA’s Office of the General Counsel’s web page to help you understand what is considered a governmental function, compensation, etc. https://www.faa.gov/about/office_org/headquarters_offices/agc/practice_areas/regulations/Interpretations/

Assuming the public safety entity meets the statutory requirements to fly under the public legal framework as a public aircraft operator, they must obtain a Certificate of Waiver/Authorization (COA) issued by the FAA to fly PAO missions. The COA is obtained through an on line application process referred to as CAPS (COA Application Processing System). To obtain a COA, the public entity must:

- produce an acceptable Public Declaration Letter (PDL) from their city/county/state legal office satisfactory to the FAA legal office. Guidelines for this letter can be found in a separate
A “UAS PRIMER FOR PUBLIC SAFETY”, PUBLIC AIRCRAFT OPS VS PART 107, DTD JAN 2020

attachment and in FAA Advisory Circular 00-1.1B. NOTE: This letter is not required for Federal Entities.

- obtain a Personal Identification Number (PIN) from the FAA, and MyAccess user ID and Password. https://auth.smext.faa.gov/register/. In order to get the PIN the public entity (the applicant) must first have produced a PDL acceptable to the FAA.
- complete an online COA application. To complete the online COA application (CAPS), you will need the PIN from the FAA to gain access to the On-line CAPS.

a. **Governmental Function.**

Among other requirements, each flight must meet the “governmental function” as defined in the Public Aircraft Statutes Title 49 United States Code (USC) § 40125(b), to be considered a qualified public aircraft operation. If the mission does not meet a strict interpretation of governmental function, it must be flown under 14 CFR part 107 because it is not a qualified public aircraft operation. The governmental function is determined on a mission (flight) by mission (flight) basis, and is not a blanket status. When in doubt, fly under Part 107. See FAA legal interpretations on Public Aircraft for more information, https://www.faa.gov/about/office_org/headquarters_offices/agc/practice_areas/regulations/Interpretations/.

b. **Aircraft Ownership or Control.**

The statutes also require that the Public Aircraft Operator must own and operate their own equipment, or have an exclusive lease (no one else can use it, in other words) for at least 90 days. Using another entity’s equipment nullifies public aircraft status, and makes it a civil (Part 107) operation. When in doubt, fly under Part 107. The statutes do allow for special case usage of aircraft not exclusively leased for at least 90 days in search and rescue emergencies but there are significant restrictions and criteria that must be complied with in that particular application. See AC 00-1.1B (and subsequent updates) Public Aircraft Operations, and the statute 49 USC 40125 (d) for more information regarding Search and Rescue purposes and Public Aircraft.

c. **Commercial Purpose.**

There is also a general prohibition on receiving any form of compensation if flying as a Public Aircraft. If the department wishes to receive any form of compensation for missions, such as Federal Emergency Management Agency (FEMA) reimbursement, they can only be flown under the civil rules (Part 107). The statutes do allow for some limited cost reimbursement from one equivalent entity to another but generally if compensation is sought from outside, that nullifies the public aircraft status. See FAA legal interpretations on Public Aircraft and Compensation using this link: https://www.faa.gov/about/office_org/headquarters_offices/agc/practice_areas/regulations/Interpretations/ and FAA Advisory Circular 00-1.1B (and subsequent updates) Public Aircraft Operations for more guidance.

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**The Public Aircraft Certificate of Waiver/Authorization (COA).**

For public aircraft UAS operators, authorization to fly in the NAS is granted via the issuance of a Certificate of Waiver/Authorization (COA) to the Public Agency.
Once the review of your public declaration letter has been completed by the FAA's legal office the documentation meets the FAA's criteria so that you may operate as a Public Aircraft Operator. Follow the steps below:

1. Visit [https://caps.faa.gov](https://caps.faa.gov), on the MyAccess Page, click "Register Here"

2. Complete the MyAccess verification process (you must use your personal information for verification only. Verification is done by LexisNexis and any discrepancies must be resolved with them, fyi.)

3. Get Verified (within seconds), If you have trouble, call the FAA helpdesk at 1-844-322-6948.

4. Once you have validated yourself in the MyAccess page, complete the COA Application Processing System (CAPS) on-line access request form and return to me so that I can forward it to the FAA CAPS on-Line Coordinator who will provide you with CAPS access.

When the FAA receives an application for a COA through the FAA’s "CAPS" process, the Agency initiates a review and application assessment of the application. Included in this review and assessment are 1) the type of mission, 2) launch/recovery/operations location(s), 3) operational altitudes, 4) flight procedures, 5) communications, 6) emergency procedures such as lost communication and loss-of-control link, and 7) pilot in command (PIC), flight crew, and observer qualifications and training requirements.

**Access to the Online COA Application Processing System (CAPS).**

As stated earlier, before the FAA grants access to the CAPS, the applicant will be asked to provide the FAA with an acceptable “public declaration letter” (PDL) from the Agency’s City, County or State Attorney’s office (the letter producer should be appropriate to the agency requesting the approval, for example a state legal authority would be appropriate for a state entity, a city legal authority would be appropriate for a city entity, etc.). This document assures the FAA that the Proponent is recognized as a political subdivision of the government of the State under Title 49 USC § 40102(a)(41)(c) or (d) and that the proponent will operate its Unmanned Aircraft in accordance with 49 USC. § 40125(b). Access to the COA on-line website and the application program will not be allowed until this declaration letter has been validated by the FAA’s Legal Office. The FAA legal office may ask for modifications or clarifications or reject the letter outright if not appropriate. This letter is not required for Federal entities, however.

It’s important to understand that an Agency’s Accountable Executive CANNOT Self-Certify their agency is a “Public” agency. The responsibility for establishing the legal nexus between the state and the agency rests with the City, County or State Attorney General and their appropriate legal counsel.

**Types of Public COAs.**

Currently, there are currently two different types of airspace authorizations available for Public Aircraft, called Certificates of Waiver/Authorization (COAs)—A Blanket COA and a Jurisdictional COA. There is an emergency amendment to an existing COA, called a Special Governmental Interest (SGI) amendment, for emergency situations whereby the terms and conditions of the COA cannot be complied with, but that is an amendment to an existing Blanket COA or a Jurisdictional COA. It is not a new COA.
General COA Info.

Our public safety contacts tell us the two major benefits of flying as a Public Aircraft under a COA (operational benefits that Part 107 (civil) operators do not get without a waiver), are the ability to operate at night, and an additional provision for First Responders in an emergency life safety situation, that allows for limited operations over human beings. Such operations must not operate any lower or in proximity to human beings necessary to accomplish the operation.

- COAs do not allow for beyond visual line of sight operations, operations from a moving vehicle, or in poor weather conditions.
- COAs are issued with explicit terms and conditions that must be complied with at all times when operating under that COA.
- A hard copy of the COA is required to be on hand with the Remote Pilot at all times, and must be fully understood and complied with.

One of the COA requirements is to file a Notice to Airman (NOTAM) prior to flight which identifies a defined operating Area where UAS operations will take place. Another requirement is to submit a monthly report to the FAA regarding UAS operations. Just as there are for manned aircraft, there are also minimum weather requirements that apply to UAS operations. Current COA weather minima are 3 Statute Miles visibility and cloud clearance per 14 CFR Part 91.155. These are the minimum weather conditions that exist at the RPIC’s location or the operation cannot take place without an emergency, temporary amendment to the COA via the SGI process. This weather limitation is not well understood by non-aviators, and it should be planned for and understood by all team members prior to the mission, especially for training missions where weather delays or cancellations could occur.

Anyone flying under the COA is the responsibility of the COA holder. It is important to understand that under 14 CFR 91.3, the pilot in command of an aircraft is directly responsible for, and is the final authority as to, the operation of that aircraft. This individual pilot in command (PIC) responsibility applies to UAS RPICs as well as manned aircraft PICs.

The two types of COAs that are utilized by Public Aircraft are:

1. **Blanket Area Public Safety (BAPS) COA** - This Blanket Area Public Safety COA approval will allow small UAS (55 pounds or less) operations during day and Night Visual Meteorological Conditions (VMC) conditions in Class G (uncontrolled) airspace under the following limitations:
   (1) At or below 400 feet AGL; and
   (2) will take place beyond the following distances from the airport reference point (ARP) of a public use airport, heliport, gliderport, or water landing port listed in the Airport/Facility Directory, Alaska Supplement, or Pacific Chart Supplement of the U.S. Government Flight Information Publications.
   a) 5 nautical miles (NM) from an airport having an operational control tower; or
   b) 3 NM from an airport having a published instrument flight procedure, but not having an operational control tower; or
   c) 2 NM from an airport not having a published instrument flight procedure or an operational control tower; or
d) 2 NM from a heliport

The Blanket COA should allow most Public Agencies the ability to meet their mission objectives, including mutual support nationwide (in Class G airspace). The typical Blanket COA application approval process is completed within 10 business days of receipt, provided there are no submittal errors, missing information, or safety or airspace issues.

2. Jurisdictional COA- For those operations that cannot operate within the Blanket area COA criteria or wish to expand their access into controlled airspace, an expanded COA application can be applied for called a “Jurisdictional COA”. This could include operations in Class D, Surface Class E, Class C and Class B Airspace as well as operations conducted during the night. When the Jurisdictional COA is issued the proponent will need to comply with the terms and conditions of the Jurisdictional COA to fly in the airspace designated within that COA. The typical Jurisdictional COA application approval process is completed within 60 business days of receipt, provided there are no submittal errors, missing information, or safety or airspace issues.

Emergency Operations. For those emergency situations where the COA holder cannot fully comply with their existing (Blanket or Jurisdictional) COA, the operator must seek an emergency, temporary amendment to their existing COA. This is also known as a Special Governmental Interest (SGI) or e-COA. This has already been discussed earlier in the paper, but here is the link to the process again: https://www.faa.gov/uas/getting_started/emergency_approval/.

Preparing Documents for CAPS.

The online COA application process (CAPS) requires that the applicant address several areas that will provide sufficient information for the FAA to make a determination as to the safety of the operations within the NAS. These documents include:

• An executive summary that will describe an overall program objective (ConOps) and an operational summary that addresses the flight mission description the proponent will be executing.
• A System description (description of the UAS technology, the Ground Control Station, Data Link Communication and any FAA Technical Standard Order (TSO) components) including the UAS registration.
• An Airworthiness Release (AWR) statement from the Proponent’s accountable executive acknowledging that the Proponent accepts all responsibility for ensuring that the UAS is airworthy and that it will be operated and maintained in strict compliance with the public agencies certification criteria.
• A lost-link procedures document that describes the specific lost-link procedure that will be implemented in the event of a lost-link occurrence (loss of command and control (C2) link).
• A lost communication procedures document that describes what action(s) the Pilot-in-Command (PIC) will take if there is loss of communication between PIC and Air Traffic Control, or lost communication between PIC and the Visual Observer(s) (VO).
• An emergency procedures document that explains the protocols/procedures that will be executed at the site in the event of an emergency (this could include execution of procedures outlined in the manufacturers supplied operator’s flight manual, other possible alternative courses of action available for each phase of flight, and any outside agencies or resources for medical and fire or other
assistance. Think in terms of the procedures the RPIC will follow to maintain the safety of participants and non-participants if something bad or unforeseen happens with the unmanned aircraft system.

- Registration of the Unmanned Aircraft System- Each UAS for Public Aircraft Operations must be registered. Registration was previously discussed in this paper.

**Flight Aircrew Qualifications.**
Public Aircraft Operators must comply with general operating rules including those applicable to all aircraft in the National Airspace System (NAS). Qualified Public Aircraft Operators may exercise their own internal processes regarding aircraft certification, airworthiness, pilot, aircrew, and maintenance personnel certification and training.

Public Aircraft Operators should establish their own training and certification program for their pilots, observers, and aircraft maintenance personnel.

Public operators are encouraged to review Advisory Circular 00-1.1B for information on how to establish internal policies, procedures, protocols and checklists to ensure safety of flight. Additionally, public entities may review pertinent parts of Federal Aviation Regulations (FAR) parts 61, 91, and 107, to familiarize themselves with areas that a certificated pilot must possess knowledge in and follow.

We encourage qualified public aircraft operators to seek out the guidance of manned aviation units that already operate as PAO and leverage their aviation experience and policies/procedures since they may have applicability to unmanned aircraft systems PAO. The FAA does not prescribe the method that public entities use when developing processes and programs; it is the responsibility of each public entity to determine these processes and programs.

**And Finally.....Some Best Practices.**
These best practices are related to us by public entities who have been early adopters. Some have been successful in their programs. Others have told us reasons why their UAS programs failed to get operational. This section is provided as a courtesy, and relates to what they tell us their suggestions are to newcomers, and is not to be construed as official FAA guidance.

The FAA Public Safety team has heard from other public safety entities that their number one recommended best practice is to **develop use cases** for how they will use this new technology BEFORE a UAS is obtained. Use cases help the department select the right equipment based on expected mission profiles. More importantly, use cases help them engage in positive discussions with their community, leadership, legal, and risk management stakeholders and significantly increased their chances of **getting “buy-in”**, acceptance or guidance as to how best to deploy them in the community. Ensuring all stakeholder parties are comfortable with the use cases proposed, as well as **fully understanding** the significance of the oversight, legal, and liabilities the city, county, or state assumes (depending on which legal framework the UAS operation is to be conducted), is another best practice we hear from other public entities who have enjoyed success with their UAS program. Another best practice we hear is to (just like most manned aviation units do) **require all pilot applicants to have a Part 107 Remote Pilot In Command (RPIC) certificate** as a minimum qualification to be considered for the position. This practice does two things for a public entity. First, since not every mission they might want to fly would be a qualified PAO, a civil Part 107 certificate would be required for those missions anyway. Secondly, requiring a Part 107 certificate ensures a basic and common level of aviation knowledge upon which a department can build for their mission specific training requirements. Under PAO, the COA holder
certifies their pilot selection, training, and currency, and a civil certificate is not required to fly qualified PAO missions, but most require it anyway for the reasons cited above. Finally, it is very important to socialize with leadership the concept that these UAS are aircraft, and just like the helicopter units, they have weather minima and other rules that may limit or prohibit an operation under the Federal Aviation Regulations. An aviation culture needs to be developed that supports the decisions of the Remote Pilot in Command, because the RPIC and the Responsible Person (the person listed on the COA or waivers listed as responsible for compliance) will be held accountable for their actions by the FAA and may be subject to civil penalties and enforcement action by the FAA for violations of the FARS. These are best practices related to us by successful practitioners and should be construed as suggestions from the industry.