

**TO:** ALL COUNTY PERSONNEL  
**FROM:** VERDENIA C. BAKER  
COUNTY ADMINISTRATOR  
**PREPARED BY:** FACILITIES DEVELOPMENT & OPERATIONS (FDO)  
**SUBJECT:** REQUIREMENTS FOR THE APPROVAL, PURCHASE AND  
OPERATION OF UNMANNED AERIAL VEHICLES (UAV)  
**PPM #:** CW-O-090

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**ISSUE DATE**  
March 23, 2021

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**EFFECTIVE DATE**  
March 23, 2021

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**PURPOSE:**

To provide a process and establish required procedures for the approval, purchase and safe operation of UAVs by County Departments.

**UPDATES:**

Future updates to this PPM are the responsibility of the FDO Business and Community Agreements Manager (“BCAM”) under the authority of the Director of FDO.

**AUTHORITY:**

- 14 C.F.R. §§ 107.1-107.205, as may be amended.
- Art. I, § 23, Fla. Const., as may be amended.
- § 119.07, Fla. Stat., as may be amended.
- § 330.41, Fla. Stat., as may be amended.
- § 934.50, Fla. Stat., as may be amended.

**DEFINITIONS:**

**Administration** – the County Administrator, Deputy County Administrator, or Assistant County Administrator, as applicable.

**BCAM** - the position within FDO that is assigned primary responsibility for administering this PPM.

**County Department or Department** - any county department that seeks approval to purchase and operate a UAV program.

**ESS** - the Electronic Services and Security Division of the FDO Department.

**FAA** - the Federal Aviation Administration, which is a division of the U.S. Department of Transportation empowered to regulate all aspects of civil aviation, including the regulation of UAVs.

**FDO** - the Facilities Development and Operations Department of the County.

**Part 107** - the FAA rules governing the registration, pilot certification and operation of civil UAVs. 14 C.F.R. §§ 107.1-107.205.

**Pilot in Command (PIC)** - a person who holds a remote pilot certification with a UAV rating and has the final authority and responsibility for the operation and safety of a UAV operation conducted under Part 107.

**Unmanned Aerial Vehicle (UAV)** - an aircraft without a human pilot aboard, that can be piloted remotely or fly autonomously. Synonymous terms include: Drone, sUAS (Small Unmanned Aircraft System), UAS (Unmanned Aircraft System), UA (Unmanned Aircraft), and ROA (Remotely Operated Aircraft).

**Visual Observer (VO)** - a person who is designated by the PIC to assist the PIC and the person manipulating the flight controls of the UAV to see and avoid other air traffic or objects aloft or on the ground.

**Waiver** - obtaining authorization (a Certificate of Waiver) from the FAA to deviate from any regulation specified in Part 107. For example, if a County Department needed to operate its UAV at night, it must petition the FAA to issue a Waiver to permit it to conduct a night operation.

## **BACKGROUND:**

The use of UAVs offers the potential to enhance and make more efficient many County services, including, but not limited to, building inspections, environmental monitoring and a myriad of Fire Rescue operations.

### **Part 107**

The FAA governs all aspects of civil aviation and has determined that UAVs are aircraft and subject to Federal Aviation Regulations. On August 29, 2016, the FAA's Small Unmanned Aircraft Rule (more commonly known as Part 107) went into effect.

Under Part 107, the FAA sets forth the requirements to conduct UAV missions as a civil operator. See 14 C.F.R. §§ 107.1-107.205. County Departments seeking to establish a UAV operation must follow and adhere to Part 107.

Part 107 requires all UAVs to be registered and the user operating the UAV have a remote pilot certificate or be directly supervised by someone with such a certificate. To achieve the remote pilot certificate, an individual must either pass an initial aeronautical knowledge test administered by the

FAA or have an existing Part 61 pilot certificate. A PIC must be designated before each UAV flight. The PIC has the final authority and responsibility for the flight mission and for ensuring compliance with all regulations.

Part 107 restricts UAV use, only permitting operation within the visual line of sight of the PIC and during daylight hours. A PIC is also precluded from operating a UAV over a human being, in close proximity to airports, and in certain airspace. Further, the UAV is restricted by weight (must be less than 55 lbs.), speed (must not exceed 100 m.p.h.) and altitude (must operate at/below 400 ft. above ground level).

If a County Department needs to conduct a mission that deviates from the UAV operational restrictions as set forth in Part 107, then that Department must seek a Certificate of Waiver (Waiver) from the FAA. A Department's request for a Waiver must contain a complete description of the proposed operation and establish that the operation can be safely conducted. The FAA will review the request and, if approved, the Department would be permitted to operate under the Waiver and would have to adhere to any limitations as set forth in the Waiver.

### **State Privacy Laws**

The Florida Constitution grants each person a right of privacy, to be let alone and free from government intrusion. Florida has traditionally recognized invasion of privacy claims where there has been an offensive intrusion (either physically or electronically) to an individual's private space. Further, Florida recognizes an invasion of privacy claim where private facts are made public, and the facts are not of public concern.

In regard to UAV use, the operator must be cautious when operating over or near private property, where an individual may have a reasonable expectation of privacy. The UAV operator should take reasonable precautions to ensure against the unintentional capture by video or photography of private property.

### **POLICY:**

It is the policy of the County that: 1) any Department desiring to purchase and use UAVs must follow the approval and procurement process set forth herein, with FDO/ESS serving as the Resource Manager; 2) any Department approved for UAV use must comply with all federal, state and local laws, including all FAA regulations; and 3) any Department approved for UAV use must adhere to safe operational practices and seek to mitigate risks to individual privacy rights. It is the County's intent to limit UAV use to only those Departments who can demonstrate that it is in the County's best interests to own and operate a UAV versus accomplishing the need through a UAV contractor. Sections B. 3. and G. of this PPM apply to both those Departments that are approved for UAV use and those utilizing the UAV contractor.

### **PROCEDURES:**

**A. UAV Approval Process:** If a Department determines that it has an operational need for a UAV, it shall adhere to the following approval process.

**1. UAV Uses:**

- a. There are many current department services or operations where UAV use might be beneficial, including, but not limited to, the inspection, monitoring, and imaging of County lands and buildings; emergency response; and search and rescue. Moreover, as the technology advances, applications for UAV use will continue to evolve.
- b. While the County recognizes the benefits of UAV use, it does not intend that every department should own or operate a UAV. In fact, it is the intent of the County to limit the use of UAVs to only those Departments who can demonstrate an operational need for UAV use, by showing that UAV use increases capacity, efficiency, or safety over traditional operational means. The Department must also demonstrate that it has the necessary infrastructure and resources in place to oversee and administer a UAV program in accordance with the requirements of the FAA and this PPM. The Department must also explain why its needs are better met by owning and operating UAV versus meeting that need by use of the County's aerial photography contract which includes UAV photography or by use of a UAV contractor.

**2. Approval of Purchase and Use:**

- a. Before purchasing a UAV or using a UAV for those departments that already own UAVs, the Department shall prepare the "UAV Request Form" attached hereto as Exhibit A, which shall include the following:
  - i. A detailed justification for the Department's UAV program, including the operational need for UAV use and the infrastructure/resources to support a UAV program, the specific types of missions to be conducted, and the specific type of UAV(s) the Department seeks to purchase and use.
  - ii. Identification of the UAV Administrator for the Department. The UAV Administrator will be responsible for ensuring the Department adheres to all the FAA rules and regulations and those set forth in this PPM and for the development of and maintaining the Department's UAV Operational Plan. It is intended that this person shall be someone of significant authority within the Department, but who also has intimate working knowledge of the Department's UAV operations.
- b. The Department shall submit its UAV Request Form and supporting documentation to the BCAM for review for compliance with the requirements of this PPM. The BCAM, in consultation with the Risk Management Director or designee, the UAV Administrator of the Department seeking approval, and the County Attorney assigned to the Department seeking approval, shall provide review comments, if any, to the Department. The Department may either modify its request based upon the review comments, or request, in writing, that the BCAM review its request as-is.
- c. The BCAM shall make a recommendation of approval or denial of the UAV request, and submit the UAV Request Form and supporting documentation to Administration for final review.
- d. Administration shall review and either approve or deny the UAV request. Administration shall return the UAV Request Form, whether approved or denied, to the BCAM to notify the Department accordingly. If Administration is not inclined to approve the request,

- he/she may meet with the BCAM to develop further conditions he/she requires for approval. Administration's decision on the UAV request is final.
- e. Once operational, if the BCAM determines a Department is not adhering to the rules and regulations as set forth herein, the BCAM shall require the Department to cease UAV operations immediately. If UAV usage is terminated, the Department must resubmit a request for approval to conduct UAV operations.
3. **County-wide Contracts:** If approved, the Department shall purchase the approved UAV(s) from any existing countywide UAV contract, or if no countywide contract is in place, through other approved means with the approval of FDO/ESS, as resource manager.

## **B. General Operational Requirements:**

1. **Minimum Requirements:** This PPM sets forth minimum requirements that shall be adhered to by any County Department approved for UAV use. However, due to the diversity of UAV uses and mission types, the individual County Department approved for UAV use is responsible for the oversight and management of its UAV program, and shall develop additional and more detailed procedures based upon the specific type of missions being conducted.
2. **Safety:** To ensure the safety of County employees and the general public, as well as public and private property, all County UAV operations shall comply with the following:
  - a. Strict adherence to all FAA, state and local safety regulations.
  - b. UAV approved County Departments shall prepare and maintain a safety manual or safety procedures, which may be integrated with the Department's UAV Operational Plan, discussed below.
  - c. To be effective, the safety manual/procedures must address risks in the following three areas:
    - i. The Aircraft – considering software and hardware issues, configuration settings, etc.
    - ii. The Environment – considering weather conditions, poor visibility, flight path obstructions, updrafts/downdrafts, etc.
    - iii. The PIC – considering skill level, training, operator fatigue, communication issues, etc.
  - d. For each UAV mission, the County Department shall utilize a VO to assist the PIC or the person manipulating the UAV flight controls to see and avoid other air traffic or objects aloft or on the ground.
  - e. The safety manual/procedures shall be reviewed and updated annually to reflect any changes in safety management best practices.
3. **Privacy:** Palm Beach County recognizes the privacy concerns involved with the use of UAVs. Accordingly, all UAV approved County Departments shall adhere to the following:
  - a. UAV approved Departments shall not knowingly or intentionally record or transmit images of a location where a person would have a reasonable expectation of privacy.
  - b. UAV approved Departments should take reasonable precautions to avoid inadvertently recording or transmitting images of a location where a person would have a reasonable

- expectation of privacy. The Department's privacy policy and training manual shall provide that the PIC needs to be situationally aware of the camera view in areas where an individual(s) may have a reasonable expectation of privacy. The Department's privacy policy shall also provide that any footage that has been inadvertently or unintentionally captured, where an individual may have had a reasonable expectation of privacy, be marked so that it is not circulated internally and so that the footage can be reviewed by the Department before release pursuant to a public records request.
- c. UAV approved Departments must retain all UAV data and recordings in accordance with their Department's public records retention policies.

### C. UAV Operational Plan Required:

1. **General:** A Department approved for UAV use shall have in place a Department UAV Operational Plan which shall incorporate the requirements and intent of this PPM into a specific departmental operating plan. The Department, and in particular the Department's UAV Administrator, is responsible for the oversight and management of its UAV program. The UAV Administrator is also responsible for knowing and incorporating all FAA and state rules and regulations, into the Department's UAV Operational Plan. The Department's UAV Operational Plan shall govern all aspects of UAV use within the subject Department.
2. **Operational Plan:** The Department's operational plan shall include, but not be limited to, policies and procedures addressing the following (*see* Exhibit B "UAV Operating Plan General Requirements" for more detailed information on drafting a UAV Operational Plan):
  - a. Intended Use.
  - b. Description of UAV System being utilized and registration information.
  - c. Operational Requirements and Restrictions.
  - d. Maintenance & Inspections.
  - e. Safety Plan and Privacy Policy.
  - f. Incident Reporting Procedures.
    - i. Any incident resulting in personal injury or property damage shall be reported to Risk Management and FDO.
    - ii. Any incident resulting in personal injury or over \$500 in property damage shall also be reported to the FAA.
  - g. Waivers.
    - i. It is recognized that Departments may need to utilize the UAV in a way that is not permitted under Part 107. For example, Fire Rescue may have an operational need to be able to operate the UAV during night time hours. If a Department has an operational need to operate the UAV in a manner that is currently restricted under Part 107, the Department must apply for a waiver from the FAA.
    - ii. Prior to submitting any waiver to the FAA, the Department shall submit the completed waiver to the BCAM for general review, responsiveness to regulatory requirements and review of success, with or without conditions, of similar waiver applications. The BCAM shall return such review to the Department within 10 business days of submittal. The Department shall consider the BCAM's review

and incorporate changes as appropriate. The Department shall submit the waiver directly to the FAA and send a copy to the BCAM.

- **Emergency Exception:** If a Department Director determines there is an emergency need, defined as an immediate risk to individual safety or damage to property, to obtain the waiver, the Department may submit the waiver directly to the FAA, providing BCAM with a copy of the waiver and documentation from the Department Director regarding the emergency need to obtain the waiver.
- iii. If the FAA grants the Waiver, the Department must add procedures to address the new operational use of the UAV. For example, if Fire Rescue obtained a waiver to fly at night, its Department UAV Operational Plan would have to be updated with procedures on safety, training, and mission planning for nighttime flights.
3. **UAV Readiness Certification:** Prior to use, the Department shall have completed all FAA and state requirements, prepared all manuals, policies and procedures as set forth in this PPM and ensured that all necessary training in both flight operation as well as maintenance and repair has taken place. When the Department is set to begin UAV operation, the Department's UAV Administrator shall execute and submit to the BCAM the "UAV Readiness Certification" attached hereto as Exhibit C and a copy of the Department's Operational Plan. Upon review of the Operational plan, the BCAM will approve the Department to begin UAV operations.
  4. **Annual Compliance Certification:** Annually, each Department's UAV Administrator will execute and submit to the BCAM a "UAV Annual Compliance Certification," attached hereto as Exhibit D, detailing that all UAV rules and regulations are being followed, and that the Department's UAV Operational Plan, has been reviewed at least once over the past year and updated, if necessary.

**D. Repairs and Maintenance:** FDO/ESS shall serve as the resource manager and as the point of contact for all maintenance and repair issues associated with the UAV. FDO/ESS shall provide the necessary front line training to the Department for all minor maintenance and repair issues, and shall set forth policies and procedures regarding the maintenance of the UAV that the Departments shall follow and adopt.

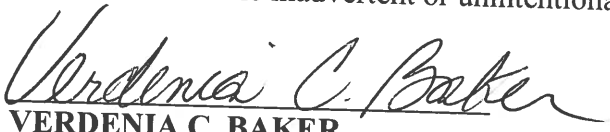
**E. Governance - UAV Compliance Committee:** In recognition that UAV regulations, as well as best practices in safety and privacy procedures are rapidly evolving, a UAV Compliance Committee, comprised of a representative from FDO, ESS, Fire Rescue, Risk Management and any other Department that is approved for UAV use, shall meet annually to review new regulations and safety and privacy standards.

**F. UAV Approved Department Providing UAV Services to other County Departments:** While the County recognizes the benefits of UAV use, the County does not intend that every department should own or operate a UAV as noted above. However, it is recognized that a department may have a one time or occasional need to conduct a UAV mission, but such need would not be sufficient to warrant a UAV purchase nor the administrative burden of running a UAV program

within that department. In such cases where a department requires limited UAV use, it may request, in writing, a Department that has been approved for UAV use, to conduct such a mission. The UAV approved Department shall review and approve/deny such a request based upon the true necessity of the mission requested and its operational capacity to perform the mission requested.

**G. Common Requirements for Departments Approved for UAV Use and those Departments Using a UAV Contractor:**

1. **SharePoint UAV Log:** Regardless of whether the flight is conducted by the contractor or a County employee, it is the Department's responsibility to log the flight in the UAV SharePoint site which shall include: the dates, approximate times, County employee contact information, purpose of flight and notes. The purpose of this SharePoint Site is to ensure that Administration, Public Affairs and FDO can direct public records requests and/or complaints to the appropriate department. In the "Notes" column, the Department shall log the Public Records Request number for any requests made for that record and whether the record was exempt in whole or in part, as well as any complaints or inquiries regarding the flight or record.
2. **Public Records:** All photography and videos captured are public records but may be exempt from disclosure pursuant to Florida Statute. It is each department's responsibility to:
  - a. consult with their Assistant County Attorney to become familiar with any exemptions typical to their operation;
  - b. create a departmental policy for filing and labeling UAV records to assist in locating specific photos and videos that, at a minimum, reference date and location (the policy shall include procedures for filing and labeling footage inadvertently or unintentionally captured where an individual(s) may have had a reasonable expectation of privacy);
  - c. review photography or video footage prior to filing so that any record that may contain exempt material is marked accordingly to avoid inadvertent disclosure (this pre-filing review shall also include a review to mark footage inadvertently or unintentionally captured where an individual(s) may have had a reasonable expectation of privacy); and
  - d. create a departmental policy for responding to Public Records Request including procedures for redaction of exempt records, or portion thereof, and for record requests containing inadvertent or unintentional video footage, where an individual may have had a reasonable expectation of privacy, including a requirement that the department attempt to clarify whether the records request intended to include the inadvertent or unintentional footage.

  
**VERDENIA C. BAKER**  
**COUNTY ADMINISTRATOR**

**Supersession History**

PPM# CW-O-090, effective 02/20/19



**EXHIBIT A  
UAV REQUEST FORM**

**TO:** FDO Business and Community Agreements Manager

**FROM:** Department Name: \_\_\_\_\_  
Department Contact: \_\_\_\_\_  
Department Contact Phone number and Email: \_\_\_\_\_  
Is Department Administrator Aware of Request: Yes \_\_\_ No \_\_\_

In accordance with PPM CW-O-090, the above named Department requests authorization to create a departmental UAV program, and in support thereof provides the following.

**1) UAV Administrator Name , Contact Number, and email:** \_\_\_\_\_  
The UAV Administrator will be responsible for ensuring the Department adheres to all the UAV rules and regulations and for the development and maintenance of the Department's UAV Operational Plan. It is intended that this person shall be someone of significant authority within the Department, but who also has intimate working knowledge of the Department's UAV operations.

- 2) Attach a UAV justification memo to this Request Form detailing:**
- a) The Department's operational need for UAV use, by showing the increased capacity, efficiency, or safety using a UAV has over traditional operational means and why it is in the County's best interest to accomplish the need through Departmental UAV use versus through the use of the County's aerial photography contract, which includes UAV photography, or by the use of a UAV contractor.
  - b) The specific types of missions to be conducted, the specific type of UAV(s) the Department seeks to use, and the timeline for obtaining Part 107 Remote Pilot Certification; and
  - c) The infrastructure and resources the Department has in place to oversee and administer a UAV program in accordance with the requirements of the FAA and PPM CW-O-090.

Signature: \_\_\_\_\_

Print Name/Title: \_\_\_\_\_ Date

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**Recommend Approval:** Yes / No \_\_\_\_\_  
BCAM Date

**Approval:** Yes/ No \_\_\_\_\_  
Assistant, Deputy or County Administrator Date

**EXHIBIT B**  
**UAV OPERATING PLAN - GENERAL REQUIREMENTS**

A Department's UAV Operating Plan shall include, but not be limited to, the following:

**1. Operations**

- (a) Department shall set forth the operational uses for the Department's UAV program.
- (b) Department shall identify that it is operating under 14 CFR Part 107 and set forth the requirements and restrictions under which the Department's UAV program will operate.
- (c) Identify specific UAVs to be used by Department.
  - (i) Process for UAV Registration & Maintenance UAV Registration Renewal log.
  - (ii) Maintain UAV flight time/maintenance logbooks.
  - (iii) Identify configuration settings.
    - 1. Ensure configuration settings are locked down and can only be changed by authorized personnel.
    - 2. Ensure safety configurations are in place (*e.g.* configured with auto-point of take-off return in event of low battery or lost transmit reception).
  - (iv) Develop mitigation strategies to protect UAVs from electronic tampering and "hijacking," or compromising of the UAV's software system over the command, control, or video taking/transmitting capacity of the UAV.
  - (v) Develop procedures to protect against insider threats or misuse - through monitoring activities, mandating two-person integrity for flight operations, and insider threat awareness training.
- (d) Pilot Requirements.
  - (i) Obtain Remote Pilot Certification in accordance with 14 CFR, Part 107.
    - 1. Remote Pilots are required to fly in accordance with all FAA rules and regulations, state laws, and the manufacturer's specifications.
    - 2. Remote Pilot Certification cards shall be in the possession of remote pilots during each mission.
  - (ii) Training.

1. Pilot in Command (PIC) must demonstrate operational proficiency to Department's UAV Administrator or his designee before being permitted to fly.
  - a. If PIC fails to fly the UAV which he/she has been deemed proficient in for a period of 180 days, then the PIC must regain proficiency by performing the flight maneuvers and emergency procedures for the specific UAV during a proficiency flight prior to undertaking an operational mission.
  - b. Refresher Training: PICs must complete refresher training (to be developed by the UAV Department) every two years following their approval to fly county missions. Elements of Refresher Training (to be developed by the UAV Department) shall include: Program and policy updates, flight exercises, risk management review, emerging trends and technology, and lessons learned/case studies.
2. Mission based scenario training.
  - (iii) Maintain Pilot logbooks, logging both experience and training.
  - (iv) A PIC cannot be utilized for more than one mission at the same time.
- (e) Missions – Operational Considerations.
  - (i) Identify mission objective, type of data needed (photo, video, thermal/IR, etc.), length of mission, airspace, altitude, conditions, time of day.
  - (ii) All flight missions must have a visual observer in addition to the PIC.
  - (iii) Develop operating procedures for:
    1. Pre-Flight Checklists.
      - a. Verify Authorizations – Agency, Incident and Airspace.
      - b. Test Communications.
      - c. Select visual observer.
      - d. Pre-flight UAV Inspection checklist.
    2. Post-flight checklists.
      - a. Verify configuration settings.
      - b. Record flight information and data points.
      - c. Conduct post-flight debriefing.
  - (iv) Develop procedures to maintain mission logs.

- (f) Incident Reporting Procedure.
  - (i) Any incident resulting in personal injury or property damage shall be reported to Risk Management and FDO.
  - (ii) Any incident resulting in personal injury or over \$500 in property damage shall also be reported to the FAA.
- (g) Waiver Process.
  - (i) Document the Department's process for obtaining a waiver.
  - (ii) Document approval of all waivers.
  - (iii) Document changes to the operational manual and safety plan as a result of Waiver.
- (h) Maintenance & Repair.
  - (i) Maintenance & Repair Training.
  - (ii) Procedure should identify FAA requirements for Maintenance.
    - 1. If any UAV undergoes maintenance or alterations that affect the UAV operation or flight characteristics (such as replacing flight critical component), then the UAV must undergo a functional test flight prior to conducting further operations.
  - (iii) Procedure for maintaining maintenance logs.
    - 1. FAA requires records be maintained on each UAV in service, including battery cycles, maintenance records, and repairs.
  - (iv) Periodic UAV inspections, including aircraft as well as software.
- (i) Maintaining Records.
  - (i) Procedure identifying how UAV video and pictures will be stored and maintained.
  - (ii) Procedure identifying retention policy for UAV video and pictures.
  - (iii) Procedure incorporating UAV video and pictures into the Department's Public Record Request policy.
- (j) Securing UAVs.
  - (i) Procedure to secure UAV from theft or damage during UAV operation and storage.

## 2. Safety & Privacy

- (a) Department shall also develop its own safety plan and privacy policy for UAV operation that complies with FAA regulations and state statutes.
- (b) The Department's safety plan shall include procedures on how to handle risk mitigation and emergency situations involving UAV use by mission type.
  - (i) Since there is a varying degree of risk associated with each flight, the Department shall establish a risk mitigation process wherein each UAV crew shall consider the following before each mission:
    1. Human factors that could have an adverse impact on the mission, such as crew illness, training, fatigue, communication issues, etc.
    2. Aircraft factors that could have an adverse impact on the mission, such as selection of the appropriate type of aircraft given the type of mission, software/hardware issues, configuration settings, etc.
    3. Environmental factors that could have an adverse impact on the mission such as weather conditions, poor visibility, flight path obstructions, etc.
    4. The PIC of the mission has the ultimate authority to decline undertaking a flight mission that he/she deems to be excessively hazardous.
  - (ii) At a minimum, the Department shall have an emergency procedure detailing the following:
    1. The failsafe systems of the UAV – capability of UAV to return to launch site in event of low battery or loss of link with the ground control station.
    2. Notification procedures and actions to be taken when Remote Pilot loses control, communication or visual contact with UAV.
    3. Notification procedure and actions to be taken when UAV crashes or causes damage or injury.
- (c) The Department's privacy policy should provide for the PIC's need to be situationally aware of the camera view in areas where an individual(s) may have a reasonable expectation of privacy. The Department should also institute procedures to review camera footage to ensure against the unintentional or inadvertent capture of private footage, and, if there is such footage unintentionally captured, the procedure to ensure such footage is flagged. These procedures should also detail how public records requests containing inadvertent or unintentional video footage will be handled, including the clarification of whether the public records request intended to include the inadvertent or unintentional footage.

**EXHIBIT C**

**UAV READINESS CERTIFICATION**

**TO:** **FDO Business and Community Agreements Manager**

**FROM:** **Department:** \_\_\_\_\_  
**UAV Administrator:** \_\_\_\_\_

I hereby confirm that the Department's UAV program is prepared and ready to begin UAV operations and certify that the Department has completed in accordance with PPM CW-O-090 the following.

- UAV purchase
- UAV registration
- UAV Remote Pilot Certification and Training
- UAV Maintenance and Repair Training
- Preparation of an Operational Manual setting forth policies and procedures to ensure compliance with all FAA regulations, state laws, and PPM CW-O-090
- Preparation of UAV safety procedures and a Privacy Policy

**Signature:** \_\_\_\_\_  
**UAV Administrator** **Date**

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**Reviewed and Approved:**

\_\_\_\_\_  
**FDO Business and Community Agreements Manager** **Date**

