



UAS Remote Identification FAQs March 2024

The following FAQs provide guidance to the commercial drone industry on compliance with the Federal Aviation Administration's (FAA) UAS Remote Identification (RID) Rule.

1. What is RID and why is it important for industry to comply?

RID is a digital license plate for drones, the requirements for which are set forth in Part 89¹ of the Federal Aviation Regulations (14 CFR). RID is the ability of a drone in flight to broadcast identification and location information that can be received by other parties in the vicinity of where the drone is operating. The RID rule promotes safety and security by providing the FAA, law enforcement, and other federal agencies with a means to distinguish authorized drone operations from unauthorized drone operations that may present a safety or security threat.

Importantly, RID is an essential prerequisite to enabling more complex and scalable commercial drone operations in the United States. Safety and security concerns raised by U.S. national security agencies have slowed rulemaking efforts needed to further integrate drones into the National Airspace System (NAS). Implementation of the RID Rule lays the safety and security groundwork to enable more complex commercial drone operations.

2. How do I comply with the RID Rule?

This will depend on whether you are a drone operator, drone manufacturer or both. Generally speaking, operators can comply by registering and operating a standard RID drone that has built-in RID broadcast capabilities or by equipping an older (non-standard RID drone) with an FAA accepted and registered RID broadcast module. Manufacturers comply by designing and producing standard RID drones or broadcast modules that meet the minimum performance requirements of the RID Rule and are accepted by the FAA.

¹ https://www.ecfr.gov/current/title-14/chapter-I/subchapter-F/part-89.

3. How does the RID Rule differ for operators and manufacturers?

Conceptually, it is best to think of the RID Rule as two separate sets of requirements for manufacturers and operators.

- <u>Operators</u>: Any drone required to be registered with the FAA must comply with the RID Rule, which includes any drone weighing .55 lbs or more and any drone flown commercially. Only drones operated by the U.S. military are excepted from the RID Rule operating requirements.² Operators have three pathways to compliance: (1) operate a standard RID drone, (2) operate a non-standard RID drone that is equipped with a broadcast module, or (3) operate in an FAA-Recognized Identification Area (FRIA) where the RID transmit requirement does not apply.
- <u>Manufacturers</u>: Unless an exception applies, all drones produced today for operation in the United States must meet the performance requirements for a standard RID drone. The following drones are excepted from compliance with standard RID drone design and production requirements:
 - Home-built UA
 - UA produced for of the United States Government
 - UA that weigh 0.55 pounds or less
 - UA designed or produced exclusively for the purpose of aeronautical research or to show compliance with regulations.

Additional exceptions apply with respect to drones manufactured under an FAA design or production approval issued under Part 21 of Federal Aviation Regulations (e.g., a type certificated UA).

4. What is a standard RID drone?

A standard RID drone refers to a drone with RID broadcast capability built into the drone by the manufacturer. The following information is broadcasted via radio frequency (e.g., WiFi or Bluetooth):

- UA serial number or session ID
- UA location (latitude/longitude) and altitude

² As discussed in the FAQs further down, operators that would otherwise be subject to compliance with the RID Rule operating requirements may seek authority from the FAA to operate a drone without broadcasting RID in some limited scenarios.

- UA Velocity
- Control station location and elevation
- Time Mark
- UA emergency status

RID broadcasts (standard and module) will be receivable on most personal wireless devices (an iPhone for example) within range of the broadcast; however, correlating the serial number or session ID with the FAA registration database will be limited to the FAA, as well as authorized law enforcement and national security personnel upon request. No personal information is broadcasted.

5. How do I know if my drone complies with the RID Rule?

All newer drone models should have built-in RID capabilities and some older drones models can become standard RID drones vis-a-vis manufacturer firmware updates. All standard RID drones must have an FAA accepted Declaration of Compliance (DOC) (discussed further below) on file with the FAA. You can look up your drone's serial number on the <u>FAA DOC database</u>³ to determine whether the drone is in compliance with the RID Rule. This process can also be used to determine whether an RID broadcast module is in compliance with the RID Rule.

6. What is a RID broadcast module and what does it broadcast?

A drone manufactured prior to implementation and enforcement of the manufacturer design and production requirements under the RID Rule (e.g., prior to December 16, 2022 when the discretionary enforcement extension granted to manufacturers expired) may be retrofitted with a RID broadcast module to bring the drone into compliance with the RID Rule. The following information is broadcasted by the RID broadcast module via radio frequency:

- Serial number of the Module;
- UA location (latitude/longitude) and altitude
- UA Velocity
- Latitude/longitude and altitude of the UA take off location
- Time mark

³ https://uasdoc.faa.gov/listDocs.

7. Is it possible to fly BVLOS using a UA equipped with a RID broadcast module?

Under the RID Rule, drones equipped with a RID broadcast module may *not* be operated BVLOS of the pilot. It is possible to obtain a waiver that authorizes BVLOS operations using a drone equipped with a broadcast module. Outreach should be sent to: RIDAuthorizations@faa.gov.

8. What is covered under manufacturer audits?

Manufacturers that need to comply with the RID Rule must allow the FAA to audit their facilities, technical data, and any standard RID drone or broadcast module produced, and allow the FAA to witness any tests necessary to determine compliance with the RID Rule. Only items related to RID compliance are subject to audit. Manufacturers of standard RID drones and broadcast modules must perform recurring audits and provide results of such audits to the FAA upon request, or when the FAA provides notice of noncompliance or potential noncompliance.

9. What should I do if I am unable comply with the RID Rule?

If your drone is not a standard RID drone and retrofitting the drone with a broadcast module is not feasible, it may be possible to obtain a waiver or authorization from the FAA that authorizes deviation from the *operating requirements* of the RID Rule. Requests can be sent via email to RIDAuthorizations@faa.gov.

Unlike the FAA's ability to provide relief from the Rule's operating requirements, the RID Rule does *not* allow FAA to authorize deviations from the standard RID drone *design and production requirements*. For this reason, it will be necessary to petition to the FAA for an exemption in order to manufacture a drone that is not a standard RID drone.

10. Are there exceptions for first responders or other public safety officials?

There is no specific carve-out excepting first responders or other public safety officials from compliance with the RID Rule. With the exception of U.S. military drone operations, all federal, state and local law enforcement agencies operating drones (and civil contractors operating drones on their behalf) must comply with the requirement to broadcast RID. However these agencies, may request authorizations from the FAA to deviate from the RID Rule's operating requirements. Requests can be sent via email to RIDAuthorizations@faa.gov.

Public safety entities conducting security-sensitive operations can seek authorization from the FAA to operate a drone without broadcasting RID in limited scenarios by submitting a request to the FAA's System Operations Security Division via email to <u>9-ATOR-HQ-IFOS@faa.gov</u>.

11. What is an RID Means of Compliance?

Manufacturer compliance with the RID Rule is demonstrated through adherence to an FAA-accepted Means of Compliance (MOC). The RID Rule sets forth the minimum performance requirements for a standard RID UA and RID broadcast module, but the Rule itself does not mandate any specific means by which a manufacturer must design and produce a product to meet the minimum performance requirements. Adherence to an FAA-accepted MOC is the means by which a manufacturer complies with the technical standards of the RID Rule.

12. What is a Declaration of Compliance and how is it filed?

Manufacturers must file a <u>Declaration of Compliance</u> (DOC) letter with the FAA declaring that the standard RID drone or broadcast module complies with the technical standards of the RID Rule using an FAA-accepted MOC. The process is generally the same for manufacturers of RID broadcast modules.

The DOC must include certain contact information for the submitter along with details on the make, model and serial number (or range of serial numbers) of the standard RID drone or broadcast module. Test data substantiating compliance is *not* required for the DOC submission, however this data should be readily available because the FAA can request the data at any time. DOCs can be submitted electronically using the FAA's online portal.⁴

The hyperlinked FAA Advisory Circulars at the bottom of this FAQ provide additional guidance on the MOC and DOC process for manufacturers.

13. Can I make my own Means of Compliance (MOC)?

Yes, although the process is technical and to date the FAA has only accepted a single RID MOC developed by ASTM (ASTM-F3586-22). In most scenarios, compliance with the FAA-accepted ASTM standard will be less burdensome than attempting to develop a unique MOC. To submit a RID MOC, contact the FAA at <u>9-AVS-AIR-UASMOC@faa.gov</u>.

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⁴ https://uasdoc.faa.gov/login.

14. Where can I find the ASTM RID MOC that was accepted by the FAA?

A copy of the ASTM standard may be purchased from ASTM here.5

15. What kind of broadcast range does a standard RID drone or RID broadcast module have?

There is no required broadcast range under the RID Rule and the broadcast range for a particular standard RID drone or broadcast module will vary depending on the broadcast type (WiFi or Bluetooth), radio power and other technical specifications. Generally speaking, RID broadcast is not intended to cover very long distances, so typically less than a 2-3 mile range.

16. What are the relevant dates for compliance?

The initial compliance date for manufacturers was September 16, 2022, however the FAA delayed enforcement of the manufacturer requirements until <u>December 16, 2022</u> for manufacturers attempting to comply with the RID Rule. Drones produced for operation in the United States after this date must be standard RID drones (unless an exception applies).

The compliance date for operators was September 16, 2023, however operators attempting to comply with the RID Rule (but who are currently unable to) have until **March 16, 2024** to comply.

<u>Useful Resources</u>:

- 14 C.F.R. Part 89 Remote Identification of Unmanned Aircraft
- FAA Executive Summary of Remote ID Rule
- Full Remote ID Final Rule and Preamble
- FAA Advisory Circular 89-1, Means of Compliance Process for Remote ID of UA
- FAA Advisory Circular 89-2, Declaration of Compliance Process for Remote ID of UA
- FAA Advisory Circular 89-3, FAA-Recognized Identification Areas
- FAA Remote ID Website
- Discretionary Enforcement Notice for Operators
- Remote ID Toolkit for Industry and Standards Bodies
- General RID Toolkit
- Know Before You Fly RID Compliance Guide

⁵ https://www.astm.org/f3586-22.html.