

City of Seattle

Unmanned Aircraft System for Film Production: Conditions for Use

The City of Seattle does not approve flight plans or dictate use of federal airspace. All Unmanned Aircraft System (UAS) use must operate in compliance with [14 CFR Part 107 requirements](#) and are subject to all FAA regulations and penalties. This document serves as a summation of legal expectations of UAS operators while filming commercially in the City of Seattle.

The City of Seattle collects operator information (FAA license, UAS registration documents, and Aviation Insurance) and general flight information to ensure legitimacy of operator's legal ability to fly, and knowledge and professionalism, and to permit legal use of public property for take-off, landing, and any control of public property required for operation of UAS.

All operations in City of Seattle right-of-way shall comply with the City of Seattle Traffic Control Manual for In-Street Work and Parks Use Permit for Parks Property Work.

All aircraft operations must adhere to the following conditions:

CONDITIONS FOR USE – UNMANNED AIRCRAFT

1. Operator must operate in compliance with the provisions of a valid [14 CFR Part 107 requirements](#). Operator must comply with any and all additional conditions and limitations set by applicable FAA regulations.
2. The City of Seattle is not responsible for any non-compliance of 14 CFR Part 107 requirements. Any observed misconduct will be reported to local FAA authorities, and any incidents occurring on set must be reported to the [FAA per accident reporting guidelines](#).
3. For [14 CFR Part 107 compliance](#), Operator must provide City of Seattle Film Office with a valid remote pilot certificate with a small UAS rating (that has been obtain in the last 2 years, or has passed most recent recurrent training modules within the last 2 years), and otherwise comply with all 14 CFR Part 107 requirements, including:
 - a. UAS must weigh less than 55 lbs. (25 kg)
 - b. Visual line-of-sight (VLOS) only; the unmanned aircraft must remain within VLOS of the operator or visual observer. At all times the small unmanned aircraft must remain close enough to the operator for the operator to be capable of seeing the aircraft with vision unaided by any device other than corrective lenses.
 - c. Small unmanned aircraft may not operate over any persons not directly involved in the operation of the aircraft/drone.
 - d. 24-hour operations are allowed, as long operator has passed most recent curriculum of FAA's recurrent testing, and appropriate anti-collision lighting has been installed if operating 30 minutes after official sunset until 30 minutes before official sunrise.
 - e. Must yield right-of-way to other aircraft, manned or unmanned.
 - f. May use visual observer (VO) but not required.
 - g. First-person view camera cannot satisfy "see-and-avoid" requirement but can be used as long as requirement is satisfied in other ways.
 - h. Maximum airspeed of 100 mph (87 knots).
 - i. Maximum altitude of 400 feet above ground level, or higher if within 400 feet of a structure
 - j. Minimum weather visibility of 3 miles from control station.
 - k. No person may act as an operator or VO for more than one unmanned aircraft operation at one time.
 - l. No careless or reckless operations.
 - m. Requires preflight inspection by the operator

4. Operations in Class G airspace are allowed without air traffic control (ATC) permission. Operations in Class B, C, D and E airspace need ATC authorization. Authorizations may be acquired through Low Altitude Authorization Notification Capability (LAANC).
5. Operator must provide City of Seattle Film Office an FAA written confirmation in the form of a Certificate of Waiver or Certificate of Exemption for any of the following:
 - a. Operation outside Class G designated airspace
 - b. Operation is from a moving vehicle or aircraft
 - c. Operation is not within visual line of sight of UAS
 - d. Operation of multiple UAS
 - e. Operation over non-participating human beings
 - f. Operation in otherwise restricted airspace
6. No Master Film Permit is required for taking off or landing on private property.
7. If taking off or landing on city-owned property (streets, sidewalks, city parks, or city owned buildings), Operator must submit a "Description of Activities" to the City of Seattle Film Office a minimum of three (3) full business days prior to the shoot. The City of Seattle permits the property use needed for safe take-off and landing zones, and for any public property requiring control. The Description of Activities is necessary to aide permit specialist in planning of the production and to advise on realities and potential conflicts of locations. All in-air activity (and activity below flight paths) is dictated by 14 CFR Part 107 requirements¹⁴ CFR Part 107 requirements.

The Description of Activities shall include:

- a. A detailed map/diagram of the flight plan, including take-off and landing location, and any areas the production wish to clear for picture, or operator deems necessary to safely operate and comply with rules regarding flights over nonparticipants.
 - b. A description of the dates and times of operation
 - c. A plan for operation
8. Operator and/or Production Company are responsible for ensuring that the UAS is not operated over human beings, except those directly participating in the operation. Operator and/or Production Company shall have sufficient staff on site to hold and prevent pedestrians that are not participating in the operation of the UAS from entering under the flight paths if necessary. Operations over human beings or over moving vehicles are only allowable with UAS that meet specifications as detailed in [Subpart D of the Part 107 guidelines](#).
 9. Operator and/or Production Company are responsible for ensuring that the UAS is operated in compliance with any other applicable law, including but not limited to SMC 12A.10.120 – Voyeurism in Public Places; RCW 9A.44.115 – Voyeurism and SMC 12A.06.050 – Reckless Endangerment.
 10. Only uniformed SPD officers, hired at the expense of the Operator and/or Production Company, are allowed to control vehicular traffic during operation. Operator and/or Production Company personnel may control pedestrian access during operation.
 11. Operator and/or Production Company are required to deliver advanced written notice to all properties within view of the operation a minimum of 72 hours prior to the activity. This notification shall include the name and phone number of a knowledgeable person associated with the production and its activities, timing of the activity, and proposed flight plan and any controlled areas. The City of Seattle Film Office may set additional parameters conditions for this notification requirement.
 12. UAS, any equipment, and all personnel must stay a minimum of 10' away from any overhead wires at all times, including Metro Trolley Wires.

13. Operator shall obtain and maintain continuously, at its own expense, Drone Aviation Liability Coverage to include in-flight operations, Bodily Injury, Property Damage, and Personal Injury coverage. In lieu of the Drone insurance policy, the City's Risk Manager will accept a general liability or aviation liability insurance policy that does not exclude Drone coverage. Minimum limits shall be \$2,000,000 combined single limit each occurrence. Operator shall also maintain any other applicable policies of insurance required and approved by the City's Risk Manager. Drone or Aviation Insurance must include an additional insured endorsement naming the City of Seattle, a waiver of subrogation, and be primary and non-contributory.
14. Production Company shall obtain and maintain continuously, at its own expense, evidence of \$1,000,000 Comprehensive General Liability insurance coverage and any other applicable policies of insurance required and approved by the City's Risk Manager as described in the Seattle Film Manual.
15. Operator and Production Company shall ensure that only the individuals listed in the Aviation Liability Insurance policy endorsement operate the UAS.

DEFINITIONS:

Operator: The company/person that is authorized by FAA regulations to fly an unmanned aircraft system.

Unmanned Aircraft System (UAS): An aircraft that is operated without the possibility of direct human intervention from within or on the aircraft.

Production Company: As defined in the Seattle Master Film Permit.

CFR: Code of Federal Regulations