



Obtain a Public Safety Part 91 BVLOS Certificate of Waiver

How To



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Overview

The Skydio Regulatory Team has developed this guide to help public safety agencies navigate the FAA process to obtain a Part 91 beyond visual line of sight (BVLOS) waiver and airspace authorization for conducting public safety operations including Drone as First Responder (DFR).



NOTE: This document only covers the minimum steps necessary to acquire a Part 91 BVLOS waiver and be compliant with FAA regulations. It does not cover best practices for unmanned aircraft operations such as drone program policy, flight crew training, public aircraft self-certification, recordkeeping, and data management. It also does not discuss Part 107 requirements.

Overview

The first section covers requesting a Part 91 BVLOS Certificate of Waiver (COW) that enables DFR operations where the Pilot in Command remotely operates X10 or other qualified small unmanned aircraft with no visual observers. This waiver also BVLOS operations in uncontrolled airspace or in controlled airspace up to the FAA UAS Facility Map altitude.

Request a Part 91 BVLOS Certificate of Waiver:

1. **Determine Eligibility**
2. **Request Part 91 BVLOS Certificate of Waiver**

The second section covers requesting an airspace authorization (Certificate of Authorization or COA) to allow your agency to operate above certain FAA UAS Facility Map altitudes that may present in your jurisdiction. Your agency must hold a Part 91 BVLOS COW before completing Step #5 below.

Request a Part 91 airspace authorization:

3. **Gain Access to FAA COA Application Processing System (CAPS)**
 - a. Obtain a Public Declaration Letter
 - b. Submit the Public Declaration Letter and CAPS Access Form to the FAA
4. **Develop the desired map and altitudes**
 - a. When possible, discuss the desired areas and altitudes with the airport
5. **Request the airspace authorization (COA) in CAPS**

Request Part 91 BVLOS

Certificate of Waiver

Two steps:

- 1. Determine Eligibility**
- 2. Request Part 91 BVLOS Certificate of Waiver**

Step 1: Determine Eligibility

To be eligible for this Part 91 BVLOS COW, public safety agencies must be eligible to conduct operations as a Public Aircraft Operator (PAO) and the public safety agency must meet the definition of a Public Safety Organization (PSO).

Public Aircraft Operator

The public safety agency should evaluate if it meets any of the following per 49 USC § 40102(a)(41):

- A. An aircraft used only for the United States Government
- B. An aircraft owned by the Government and operated by any person for purposes related to crew training, equipment development, or demonstration
- C. An aircraft owned and operated by the government of a State, the District of Columbia, or a territory or possession of the United States or a political subdivision of one of these governments
- D. An aircraft exclusively leased for at least 90 continuous days by the government of a State, the District of Columbia, or a territory or possession of the United States or a political subdivision of one of these governments

Additionally, the agency may not conduct operations as a PAO for commercial purposes as defined in 49 USC § 40125(a)(1).

NOTE: Reference [FAA Advisory Circular 00-1.1B](#) and the [2023 Interpretation on Governmental Function](#) for information on what constitutes PAO and commercial purpose. The following is a summary of PAO qualifications.

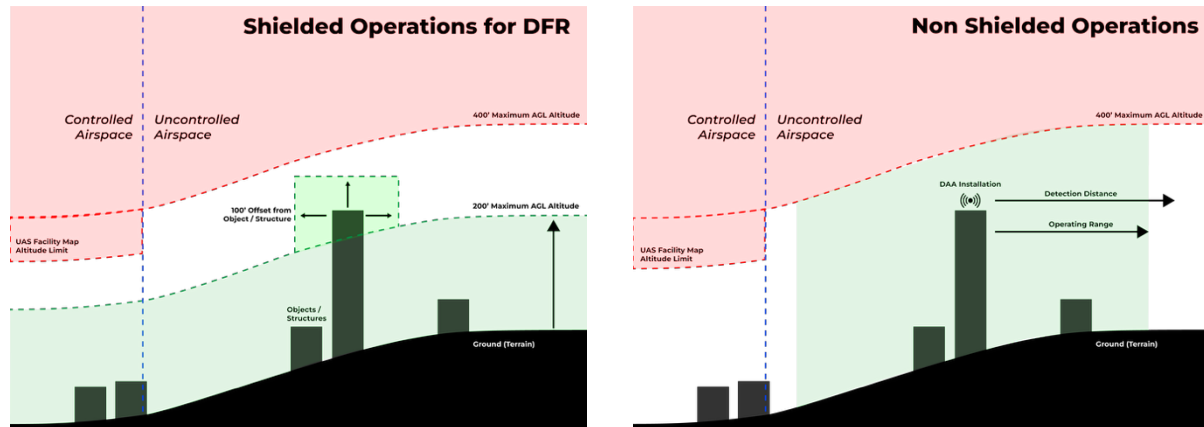
Public Safety Organization

Public safety agencies pursuing this type of Part 91 BVLOS COW must also meet the definition of a PSO per Public Law per 49 USC 44806(e). In this section, PSO means a public safety organization that primarily engages in activities related to the safety and well-being of the general public, including law enforcement, fire departments, emergency medical services, and other organizations that protect and serve the public in matters of safety and security.

If you're a public safety agency that is eligible for PAO, but not strictly a PSO, you may still be eligible for a Part 91 BVLOS COW. Please reach out to Skydio at aviation_regulatory@skydio.com to discuss your options.

Step 2: Request Part 91 BVLOS Certificate of Waiver

The FAA offers two types of Part 91 BVLOS waivers. The following table outlines the two concepts and 3 key differences between them:



- | | |
|--|---|
| <ul style="list-style-type: none">• Operations up to 200' AGL<ul style="list-style-type: none">◦ Operations above 200' AGL allowed when within 100' of an object• ADS-B In only for airspace awareness• Blanket approval | <ul style="list-style-type: none">• Operations up to 400' AGL• ADS-B In and non-cooperative Detect and Avoid (DAA) technology for airspace awareness• 400' within detection volume, 200' elsewhere |
|--|---|

There are different requirements and forms to complete depending on the selected waiver option. Skydio recommends that all agencies pursue the Shielded Operations for DFR (200') COW initially as it is a quick and straightforward way to get jurisdiction-wide BVLOS approval. If your agency plans to deploy non-cooperative DAA technology, the Non-Shielded Operations (400') waiver can be requested as well.

If you're interested in learning more about 400' waiver requests and DAA technology, watch Skydio's webinar by [clicking here](#).

Develop FAA request documentation

The agency must submit a set of documents to the FAA as follows:

1. **FAA Form 7711-2**
2. **PAO - PSO Letter**
3. **PAO-PSO 91 BVLOS Waiver Checklist** (either 200' or 400' checklist)
4. **Concept of Operation**
5. **CMD – DAA document** [Only required for 400' request]

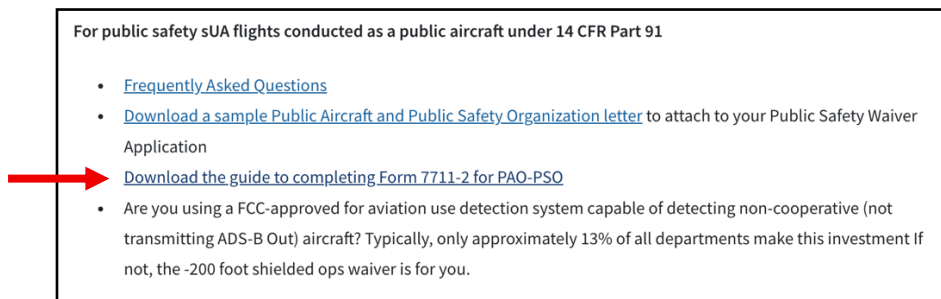
NOTE: The guidance in this section assumes the agency is requesting the 200' AGL operations with Skydio X10. If your agency intends to use more than one type of drone make/model, or is requesting operations up to 400' AGL, it is your responsibility to provide additional information where appropriate including additional information about the drone make/model(s) and operating above 200' AGL.

FAA Form 7711-2

Form 7711-2 is an FAA form for applicants requesting a Certificate of Waiver or Authorization. The form is available here: <https://www.faa.gov/forms/index.cfm/go/document.information/documentID/186161>

The FAA has also developed a guide for filling the Form 7711-2 out for this specific type of request. This guide is available on the FAA's Public Safety Toolkit website:

https://www.faa.gov/uas/public_safety_gov/public_safety_toolkit

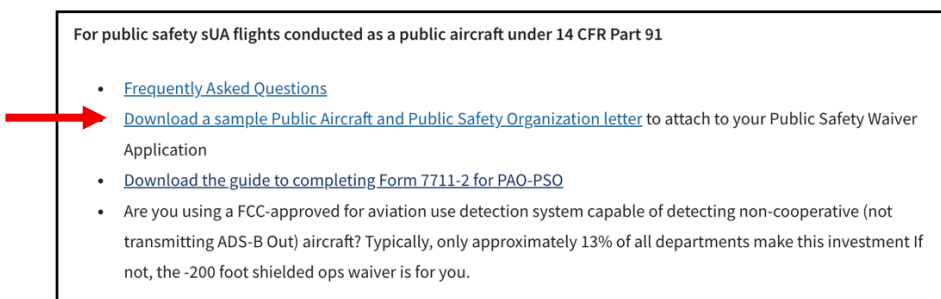


PAO - PSO Letter

The public safety agency must declare that they are eligible for PAO and meet the definition of a PSO with a written declaration letter. The letter should:

- Include contact information for the agency and the Responsible Person,
- State the agency's name,
- State the agency is a part of a political subdivision and meets the statutory definition of Public Aircraft in 49 USC 40102(a)(41),
- State the agency meets the definition of Public Safety Organization per 49 USC 44806(e),
- Provide examples of the types of public safety missions the agency conducts
- Be signed by the agency's Responsible Person

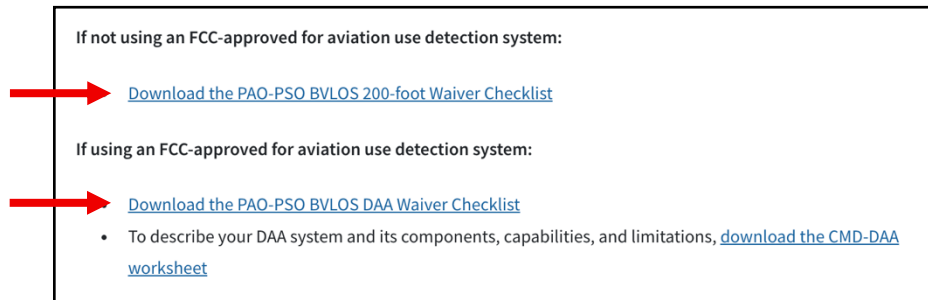
The FAA has a sample Public Aircraft and Public Safety Organization letter available on the FAA's Public Safety Toolkit website: https://www.faa.gov/uas/public_safety_gov/public_safety_toolkit



If you're an agency that is eligible for PAO, but not strictly a PSO, please reach out to Skydio at aviation_regulatory@skydio.com to discuss your options.

PAO-PSO 91 BVLOS Waiver Checklist

The public safety agency must complete an applicant self-select checklist developed by the FAA to increase the likelihood of submitting a satisfactory safety case. There are two versions of this checklist – one for requesting Concept #1 – Shielded Operations for DFR (200') and one for requesting Concept #2 – 400' Non-Shielded Operations (400'). The FAA has both checklists available on the FAA's Public Safety Toolkit website: https://www.faa.gov/uas/public_safety_gov/public_safety_toolkit



The Responsible Person should select the appropriate checklist, carefully review each provision, and initial the box next to it to indicate the agency's agreement to operate under the stated provision and sign the checklist. The notes below provide additional detail and clarification on the items in the checklist.

Item #	Skydio Notes
Item #3	The FAA asks for a complete description of the proposed operation. The Concept of Operation section below provides additional detail for this requirement.
Item #6	Skydio X10 is equipped with anti-collision lighting (Strobes) that meets this requirement.
Item #7	Skydio X10 is Standard Remote ID compliant. Declaration of Compliance is available here: https://uasdoc.faa.gov/listDocs/RID000000750
Item #8, #9, and #10	These three items refer to operating over human beings and drone airworthiness. Your agency is responsible for self-certifying the airworthiness of all drones when conducting public aircraft operations under a Part 91 COW. Your agency should accomplish this by: - Conducting routine maintenance in accordance with manufacturer instructions, and - Performing Functional Check Flights after maintenance actions, and - Conducting preflight inspections in accordance with the drone manufacturer's inspection procedures when available and/or an inspection procedure developed by the agency - Generate an Airworthiness Release listing the drone make/model being operated and stating that the agency self-certifies their airworthiness. NOTE: See Appendix B for an example of an Airworthiness Release.

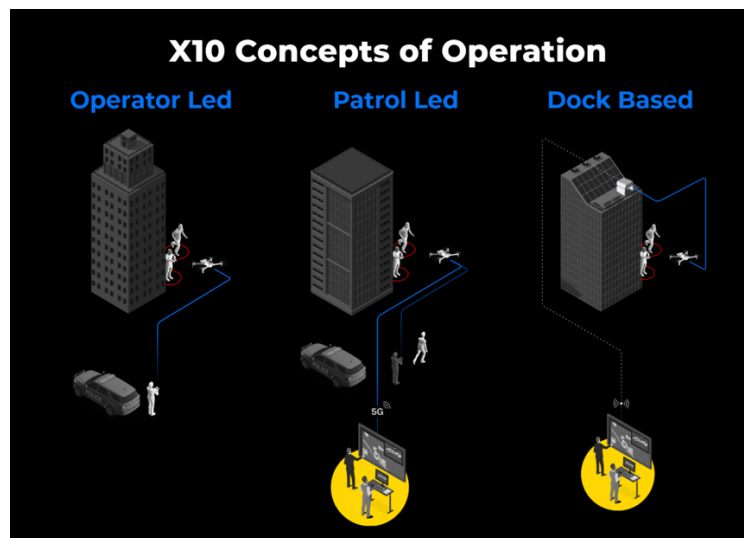
	FAA's Advisory Circular 107-2 Chapter 5.5 and Chapter 7 provide additional information on maintenance best practices. Operations over human beings in live saving situations • A mechanism to prevent rotating parts from causing laceration (Item #8) and a Parachute Recovery System (per Item #9) are <u>optional</u> Operations over human beings in non-life saving situations • A mechanism to prevent rotating parts from causing laceration (Item #8) and a Parachute Recovery System (per Item #9) are <u>required</u>
Item #11	Skydio X10 and X10 Dock are equipped with an ADS-B In receiver and data is displayed on Skydio Flight Deck and Remote Flight Deck. No additional technology is required. Contact the Skydio Regulatory Team at aviation_regulatory@skydio.com for a slide deck explaining how Skydio X10 airspace awareness system works and how it is used to maintain a safe distance from crewed aircraft.

Concept of Operation

Item #3 of the PAO-PSO 91 BVLOS Waiver Checklist asks for a complete description of the proposed operation. Skydio recommends providing this description in the form of a Concept of Operation document. The Concept of Operation document should contain the following information:

- Flight Area / jurisdiction
- Information about the small, unmanned aircraft
- Information about flight crew qualifications and training
- Information about the ADS-B In equipment and procedures being used to maintain a safe distance from crewed aircraft
- Normal operating procedures
- Abnormal and emergency procedures

Skydio X10 can be operated BVLOS under this CoW in three different ways:



1. Operator-Led

In this framework, the PIC physically places the sUA at the takeoff location and connects to it via the X10 controller. The PIC conducts a physical preflight of the drone and scan the airspace and environment around the takeoff location for hazards.

2. Patrol Led

In this framework, the X10 is prepared for operation by trained personnel (temporarily acting as VO) and placed in a safe location for launch. The PIC uses LTE to connect to the sUA from Remote Flight Deck and conducts the operation from takeoff to landing.

3. Dock Based

In this framework, the X10 is placed in Skydio Dock and operated through Skydio Cloud and Remote Flight Deck. The PIC may not be physically located at the Dock location, in which case he or she will conduct an electronic preflight.

In all three methods, once airborne, the PIC may operate BVLOS as long as the provisions of the CoW are met including operating at or below 200' AGL or within 100' of objects, over congested areas, and ADS-B on the controller is monitored to remain a safe distance from aircraft.

Skydio has developed a Concept of Operation template to assist you in developing this document. Contact the Skydio Regulatory Team at aviation_regulatory@skydio.com for this template.

CMD-DAA Document

If your public safety agency is requesting to operate up to 200' AGL or within 100' of an object during flight, the CMD-DAA document is not required.

If your agency is deploying detect-and-avoid technology, such as radar, acoustic, or visual systems to detect non-cooperative crewed aircraft, the FAA is encouraging applicants to submit the CMD-DAA document for technology evaluation.

- Entities deploying DedroneBeyond should contact aviation_regulatory@skydio.com for assistance completing this document.
- Entities deploying other detect-and-avoid technology should contact their vendor for assistance completing this document.

FAA Submission

When all the documentation is signed and ready, the request is submitted to the FAA by emailing 9-AVS-AFS-750-91.113Waivers@faa.gov and requesting a PAO – PSO Part 91 BVLOS waiver. An example of the email body is shown below (replace the fictitious Teles Police Department¹ with your agency's information):

Hello 91.113 Waiver Team,

Teles Police Department is requesting a PAO – PSO Part 91 BVLOS waiver to conduct law enforcement and emergency response operations in the City of Teles. See attached documents for review:

- *TPD FAA Form 7711-2*
- *PAO PSO Letter*
- *PAO – PSO 91 BVLOS Waiver Checklist*
- *CONOPS – PSO PAO Part 91 BVLOS Waiver Request*
- *[if requesting operations above 200'] CMD-DAA Document*

Regards,

Monitor your email for correspondence back from the FAA on the request. Once the 91.113 Waiver Team approves the request, they will email the applicant back with an approved Part 91 BVLOS CoW.

Approval!

Once the FAA emails you back a signed, approved waiver, read the waiver carefully to understand and comply with the provisions and requirements. Skydio did a webinar on the 200' waiver provisions to help your agency understand the requirements in simpler terms. Watch the webinar by [clicking here](#).

¹ Teles Police Department is a fictional law enforcement agency used in examples throughout this guide.

Request to Operate Above UAS Facility Map Altitudes

Three steps:

- 3. Gain access to FAA COA Application Processing System (CAPS)**
- 4. Develop the requested map and altitudes**
- 5. Request a COA in CAPS**

Step 3: Gain Access to CAPS

Obtain a Public Declaration Letter

Public safety agency that are part of the government of a State, the District of Columbia, or a territory or possession of the United States or a political subdivision of one of these governments² need to declare status as a PAO with a written declaration letter created by an entity that is in a position to determine that your agency is qualified. **An agency cannot self-declare as a PAO.** The entity may be the City Attorney, County Attorney, State Attorney General, or an entity under legal contract with the public agency.

The FAA has provided Public Declaration Letter guidance available by contacting aviation_regulatory@skydio.com.

The letter declares that the public safety agency is eligible for PAO status and attests that the agency will not conduct public aircraft operations for commercial purposes. The letter should:

- Be on official letterhead from the entity determining your agency's eligibility
- Make a clear statement outlining the political subdivision and the agency including:
 - Reference statutory citations that qualify the agency as a political subdivision of the state for the purposes of operating as a public aircraft operator under Title 49 USC § 40102(a)(41)(C) or (D)
 - Reference statutory citations that outline the agency's authorities
- Attest that the agency will not operate the aircraft for commercial purposes (compensation or hire) in compliance with Title 49 USC 40125(a)(1)³ and 40125(b)⁴.
- Be dated and signed by the attorney making the declaration, including contact information

A template letter, shown in Appendix A, is included with this memo to assist in creating this declaration. This example is to be used for educational and reference purposes only.

NOTE: Public safety agencies that meet the definition of 49 USC § 40102(a)(41)(A) or (B) do not need to declare this status with a Public Declaration Letter but maybe be asked by the FAA to provide another form

² 49 USC § 40102(a)(41)(C) or (D)

³ **49 USC § 40125, Qualifications for Public Aircraft Status:**

(a)(1) Commercial purposes.—The term “commercial purposes” means the transportation of persons or property for compensation or hire, but does not include the operation of an aircraft by the armed forces for reimbursement when that reimbursement is required by any Federal statute, regulation, or directive, in effect on November 1, 1999, or by one government on behalf of another government under a cost reimbursement agreement if the government on whose behalf the operation is conducted certifies to the Administrator of the Federal Aviation Administration that the operation is necessary to respond to a significant and imminent threat to life or property (including natural resources) and that no service by a private operator is reasonably available to meet the threat.

⁴ **49 USC § 40125, Qualifications for Public Aircraft Status:**

(b) Aircraft Owned by Governments.—An aircraft described in subparagraph (A), (B), (C), or (D) of section 40102(a)(41) does not qualify as a public aircraft under such section when the aircraft is used for commercial purposes or to carry an individual other than a crewmember or a qualified non-crewmember.

Submit Public Declaration Letter and CAPS Access Form to the FAA

A signed copy of the Public Declaration letter and a completed CAPS Access Form should be emailed by the agency's Drone Program Manager (or equivalent role) to 9-AJV-115-UASOrganization@faa.gov for FAA review and acceptance. The CAPS Access Form is available here:

https://caps.faa.gov/VAADIN/resources/CAPS_Access_Request_Form.pdf

Indicate in the email that you are requesting access to the COA Application Processing System (CAPS) to submit COAs on behalf of your agency. Here is an example of an email requesting access to CAPS:

Good Morning / Afternoon,

I am requesting access to the COA Application Processing System (CAPS) to submit COAs on behalf of the Teles Police Department ⁵ for law enforcement and emergency response purposes. A public declaration letter is attached for your review.

Do not hesitate to contact me with any questions about the request.

Regards,

Upon acceptance, the FAA then creates a CAPS website login for the user and email address noted on the CAPS Access form. It may take up to 15 business-days for the FAA to establish an account within the online program that is partitioned to allow for security of the data that the public agency enters.

The FAA will provide further instructions on how to access the CAPS account.

⁵ Teles Police Department is a fictional law enforcement agency used in examples throughout this guide.

Step 4: Create a graphic and KMZ with requested areas and altitudes

A graphic and KMZ representation of the proposed flight areas and altitudes must be included in the COA request for the Service Center and airport's review. The graphic and KMZ help the Service Center and airport effectively review the COA request and conduct their risk assessment. An example of a graphic is shown below, with the standard UASFM on the left and a graphic with requested altitudes above the UASFM shown on the right:

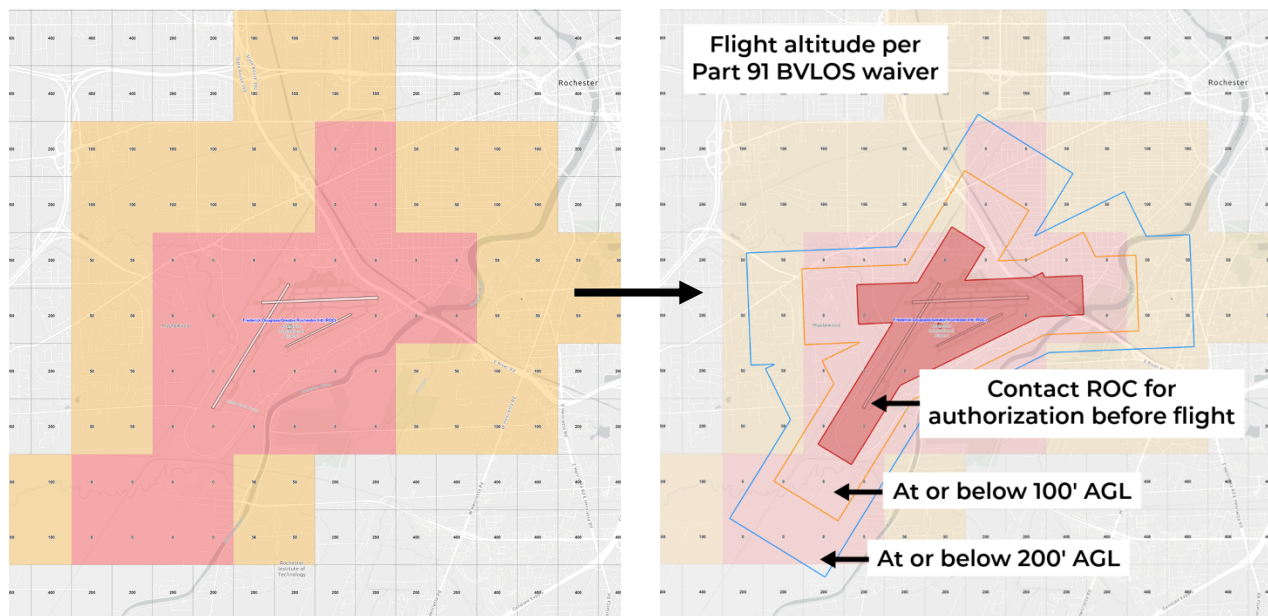


Figure 1 Example of UASFM (left) compared to a graphic to request operations above UASFM (right)

When developing the areas and altitudes your agency intends to request, consider where low flying crewed aircraft will be present. UASFM altitudes indicate where the FAA has determined drones can safely operate without additional safety risk assessment. Typically, there's an area of "zero grids" directly over the airport and additional zero grids extending from each runway's centerline. Grid numbers (allowed altitude AGL) the gradually increase as distance from the runway increases. Zero grids protect aircraft on approach, departure, or in the traffic pattern. They can also be configured around heliports, for security reasons, or for common low-altitude flight paths.

Request to Operate Above UASFM Altitudes

The following are some examples to illustrate these points. The images below show a heatmap of ADS-B equipped aircraft operating below 500' AGL near and along the runway centerlines of Rochester International Airport.

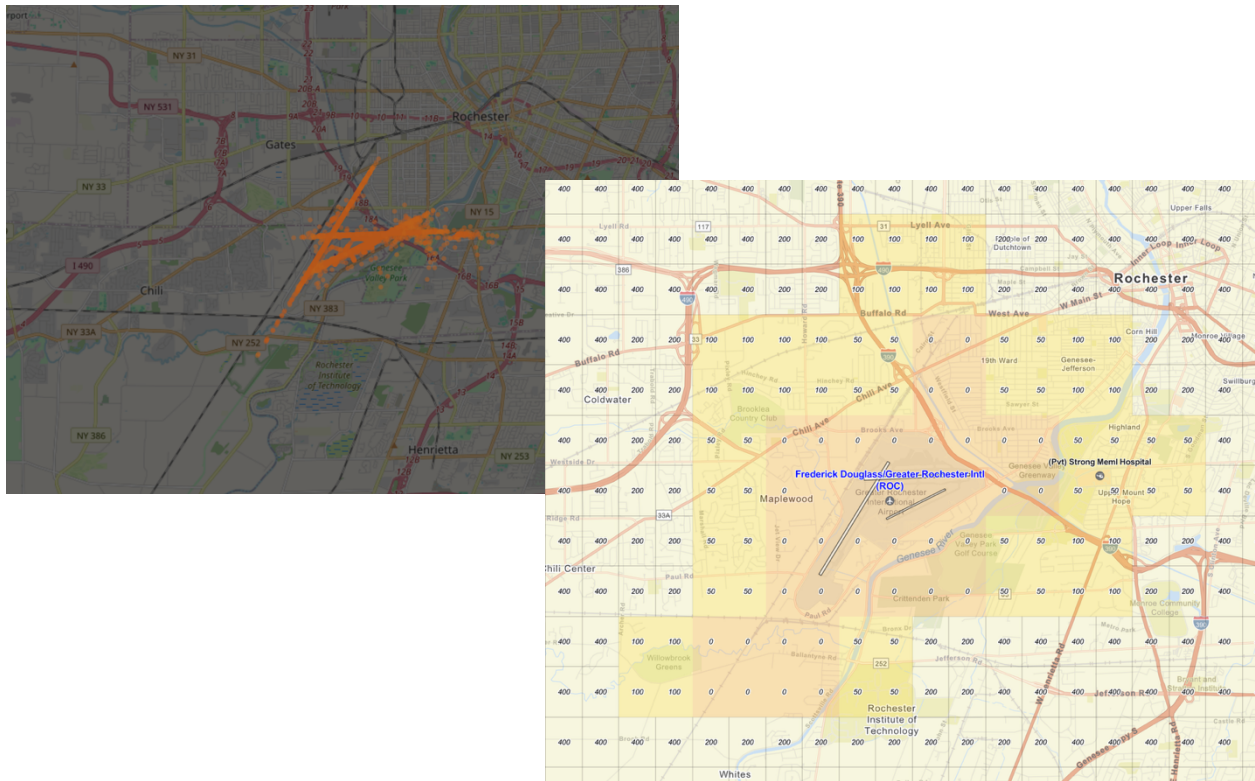


Figure 2 Heatmap of ADS-B traffic below 500' AGL (top) and ROC airport runway configurations with UASFM (bottom)

The image to the right shows Bismarck Municipal Airport UASFM where 50- and 100-foot grids have been configured over the hospital helipad and a ND National Guard helipad.

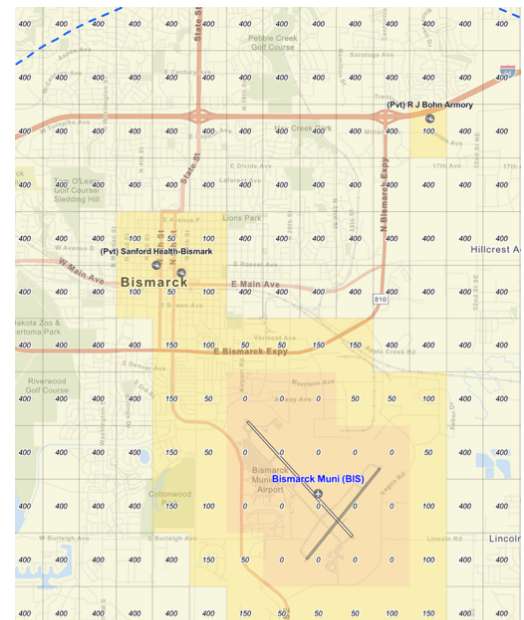


Figure 3 KBIS UAS Facility Map

Request to Operate Above UASFM Altitudes

Requesting to operate above these altitudes triggers a safety risk assessment and the success of the application depends on your agency's ability to mitigate the risk of encountering low altitude crewed aircraft in the requested area.

One strategy to mitigate the risk of encountering a low flying aircraft is to operate at altitudes below their expected approach and departure flight paths. Skydio Regulatory Team conducted a general analysis of crewed aircraft altitudes along runway centerline during takeoff and departure from airports.

- During approach:
 - Typical glideslopes are around 3 degrees – resulting in a descent of 314' per nautical mile
- During departure:
 - Typical minimum departure climb rates are 200' per nautical mile to ensure aircraft are above the obstacle clearance surface of 40:1

Based on this, proposing flight altitudes at the distances below provide sufficient separation between crewed aircraft and the sUA:

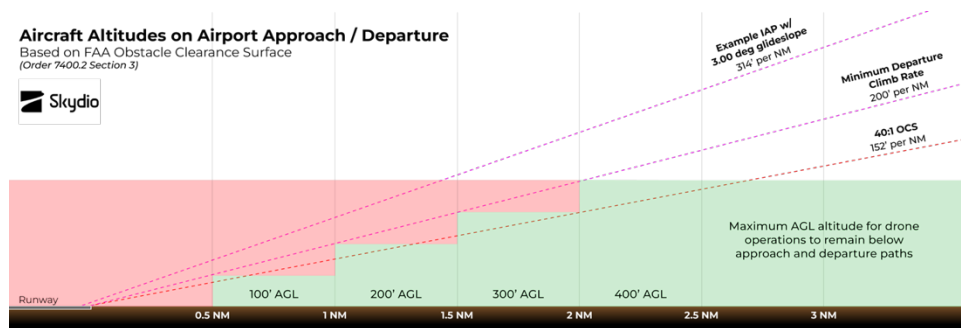
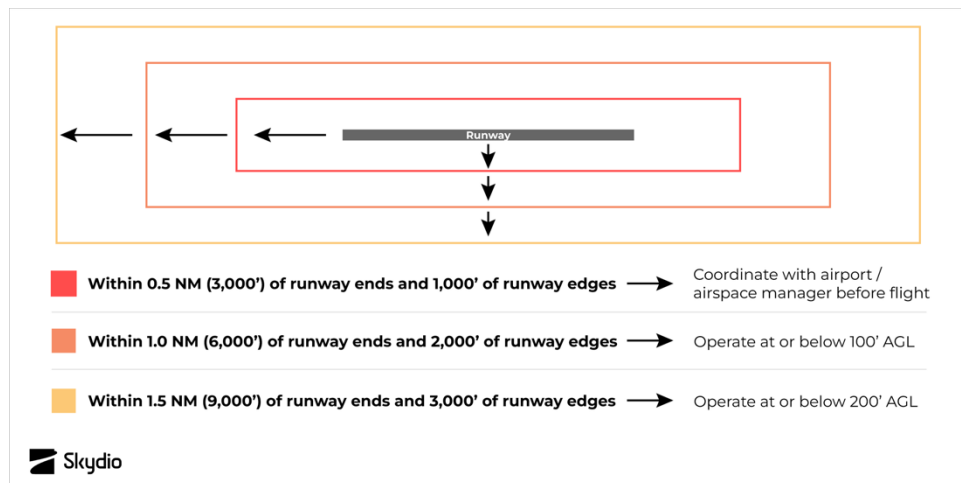


Figure 4 Typical approach and departure altitudes at distances from runway



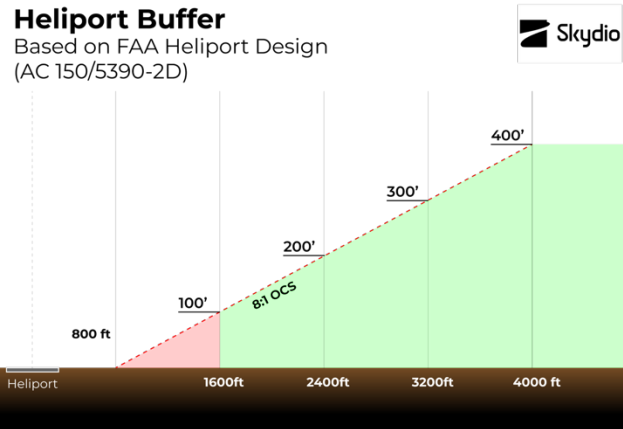


Figure 5 Obstacle Clearance Surface from heliport and recommended flight altitudes

Another strategy is to create a heatmap of ADS-B equipped aircraft to further understand where low flying aircraft are operating in your jurisdiction. One open-source way to create an ADS-B heatmap is to use ADS-B Exchange:

1. Go to <https://globe.adsbexchange.com/> and center the map on your jurisdiction using pan/zoom controls.
2. Put the following URL into your browser to initiate the heatmap analysis:
<https://globe.adsbexchange.com/?heatmap=500000&heatAlpha=0.5&heatManualRedraw&heatDuration=72>
 - a. This URL will create a heatmap with 500,000 points over 72 hours
 - b. Depending on your computer's computing capabilities, it may take some time for ADS-B Exchange to display the heatmap
3. ADS-B Exchange will eventually show a heatmap with all ADS-B equipped aircraft
 - a. It's recommended to use the "Filter by Altitude" feature on the right toolbar to filter the heatmap to show only traffic that are between 0 – 500' AGL. The filter is in feet MSL, not feet AGL though, so you will need to know the approximate field elevation of the airport to do this. For example, if you field elevation is 1,500' MSL, you would filter traffic from approximately 1,500' to 2,000'.

ADS-B Exchange also has some basic instructions on this webpage: <https://www.adsbexchange.com/map-help/>

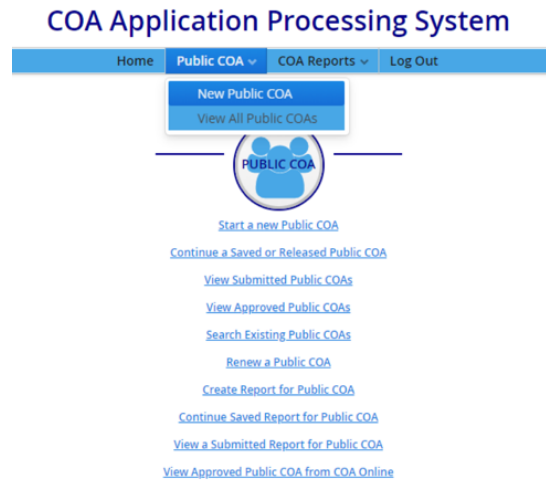
Once you've developed the initial proposal, if possible, review the proposed map and requested altitudes with the airport directly before submitting the COA request. This is an opportunity to review areas of concern with the airport and further refine the map and requested altitudes.

Step 5: Requesting a COA above UAS Facility Map altitudes

The individual with access to CAPS now begins a COA application to obtain COA that allows operations above the UAS Facility Map altitudes in accordance with the approval BVLOS waiver.

The application is started by clicking the “Start a new Public COA” in the CAPS home page.

A Proponent Information page will now display. To navigate through the COA submission process, use the sections on the left-hand side of the screen to jump to a specific page, or complete each page in sequence and use “Save and Next” at the bottom to save your progress and move to the next step.



➔ Proponent Information

Sponsor	<i>[NAME OF YOUR AGENCY]</i>				
Attention of	<i>Drone Program Manager or other Accountable Executive for the Agency</i>				
Address	<i>Mailing address (do not use a PO Box)</i>				
Address 2					
City	<i>City</i>	State	<i>State</i>	Postal Code	<i>Zip code</i>
Telephone	<i>Phone number for individual listed in “Attention of” above</i>				
Email	<i>Email address for individual listed in “Attention of” above</i>				

Save and Next

➔ Declarations

A	Yes
B	Yes
C	No <i>(Yes for US Armed Forces)</i>
D	No <i>(Yes for entities of the federal government of the United States)</i>
E	Yes <i>(No if you answer Yes to C or D)</i> Upload Attach the Public Declaration Letter from Step 3 here
F	Yes
G	Yes
H	Yes

Save and Next

Request to Operate Above UASFM Altitudes

➔ Point of Contact Information

The Point of Contact should be an individual who the FAA can reach out to regarding any issues with the COA or drone operations. It can be the same individual as the Proponent Information above.

Save and Next

➔ Operational Description

The Start Date and End Date are filled out by the FAA once the COA request is approved.

Program Executive Summary	[AGENCY NAME] will utilize small UAS in support of law enforcement purposes. [AGENCY NAME] utilizes small UAS in support of law enforcement purposes. This request is to enable routine BVLOS operations above UAS Facility Map altitudes in [APT CODE] according to the attached map.
Operational Summary	This application is to request routine operations at 200' AGL, above UAS Facility Map altitudes of [APT CODE]. Small UAS operations will be conducted accordance with approved Part 91 BVLOS waiver [PART 91 WAIVER #]. The approved waiver, a graphic with proposed altitudes, and KMZ are attached to the application. Example: <i>Operation of small unmanned aircraft system(s) weighing less than 55 pounds and operating at speeds of less than 100 miles per hour in Class B, Class D, and G airspace at or below 400' AGL within the lateral boundaries of the City of San Mateo. Operations will be conducted below UAS Facility Map altitudes in controlled airspace.</i>
VFR Operation	Yes
IFR Operation	No
Day Operation	Yes
Night Operation	Yes
Light Out Operation	No
Class of Airspace	Check each Class of airspace that is within your agency's jurisdiction

Save and Next

➔ UAS Platform

The UAS Platform section adds an additional 9 pages that must be completed at least once. Once an aircraft type/model is created and saved in CAPS, it can no longer be edited and becomes available in the dropdown for subsequent COA applications.

- If you have already created a Skydio X10 aircraft in your CAPS account, add it to the application and hit "Save and Next". Then skip to the "Visual Surveillance" section below.
- If you have not created a Skydio X10 aircraft before, click "Create New Aircraft", then "Create new aircraft with blank forms", then "UAS Platform Description" page on the left to get started.

Request to Operate Above UASFM Altitudes

→ UAS Platform Description

Aircraft Type / Model
[AGENCY ACRONYM] Skydio X10

Performance Characteristics			
Climb Rate	Descent Rate	Turn Rate	Bank Angle
1200	780	6000	40

Cruise Speed		Operating Altitudes	
Maximum	31	Maximum	15000
Minimum	0	Minimum	0
Approach Speed	10	Gross Takeoff Wt	5.49
Range	5.4	Endurance	00:35
Launch Method	Vertical Takeoff	Recovery Method	Vertical Landing

Avionics / Equipment		
Equipment Suffix Type		Transponder
X		No
		(remaining boxes gray out)
GPS	Yes	
Moving Map Indicator	Yes	
Tracking Capability	No	
TCAS/MCAS	No	
ELT	No	

Save and Next

→ Airworthiness

Part 91 regulations require that civil operators operate aircraft with an FAA Airworthiness Certificate. Skydio aircraft do not have an FAA Airworthiness Certificate because one is not required for operating under Part 107 or for Public Aircraft Operators operating under Part 91 with a COA.

Public Aircraft Operators, instead, self-certify the airworthiness of the aircraft. To do this, the agency must create an Airworthiness Statement **on agency letterhead** that declares the aircraft airworthy and that it will be maintained in a condition for safe operation. A template of an Airworthiness Statement can be found in Appendix B.



The Airworthiness Statement is attached to the second Upload button, underneath the “If No FAA Certificate (Public Aircraft Only) heading.

Save and Next

Request to Operate Above UASFM Altitudes

→ Lost Link / Mission Procedures

Activation Time	10
-----------------	----

Options	Altitude	If Link re-established
Turn around, directly come back to base	Maintain Current Altitude	Continue

ATC Contact			
Name	Name individual who can be contacted by ATC	Phone	Phone number of individual who can be contacted by ATC

 Finally, a document describing the lost link procedures should be attached at the bottom of this page. Skydio has developed a document describing the lost link behavior of its drones to upload on this page. The document is available upon request by emailing aviation_regulatory@skydio.com.

Save and Next

→ Lost Communication Procedures

During a Loss of Communications,		Loss of Visual Sight with UAV
Between Observer and PIC using	Between PIC and ATC using	PIC will contact
Direct Voice	Handheld vhf radio	Observer
The PIC will use	The PIC will use	The PIC will use
Cell phone	Cell phone	Cell phone

 The FAA has asked for agencies to upload Loss of Comm documentation in the past. It's not necessary for BVLOS without Visual Observer operations but to preempt getting a request from the FAA to upload something, Skydio has developed a Lost Comms document to upload on this page. The document is available upon request by emailing aviation_regulatory@skydio.com.

Save and Next

→ Emergency Procedures

 A document describing emergency procedures should be attached at the bottom of this page. Skydio has developed a document describing the emergency behaviors of its drones to upload on this page. The document is available upon request by emailing aviation_regulatory@skydio.com.

Save and Next

➔ Lights

Landing	No
Position / Navigation	Yes
Anti-Collision	Yes
Infrared	No

Save and Next

➔ Spectrum Analysis Approval

Data link	Yes
Control link(s)	Yes
Operations utilizing Radio Control	No

Save and Next

➔ ATC Communications

Select “No” for every option on this page!

Save and Next

➔ Electronic Surveillance

Onboard Aircraft	
Electro-Optical / Infrared	No
Terrain Detection	No
Weather / Icing Detection	No
Onboard Radar	No
Electronic Detection Systems	No
Forward or side looking cameras	Yes

Ground Based	
Radar Observer	No

Save and Next

➔ Aircraft Performance Recording

Flight Data Recording	Yes
Control Station Recording	Yes
Voice Recording	No

Save and Next

➔ Confirmation

Click “Confirm”

➔ Add the aircraft to the COA application

Select the aircraft now from the dropdown list, click “Add to COA” and verify the aircraft has been added below the dropdown box.

Save and Next

➔ Visual Surveillance

Maximum Distance from UAS		
Vertical	200	AGL
Horizontal	5	NM

Airborne based	No
Ground based	No
Visual observation from one or more ground sites	No

Save and Next

→ Flight Operations Area / Plan

Upload

On this page, it's recommended to upload the following documents and files:

- Your agency's approved 200' and 400' Part 91 Certificate of Waiver and Authorization
- The graphic that depicts the requested flight area and altitudes (developed in Step 4)
- A KMZ of the flight area (developed in Step 4)

It is not necessary to draw any shapes on the CAPS map or provide any other information on this page.

Save and Next

→ Flight Aircrew Qualifications

Public aircraft operators self-certify their flight crewmembers. This means the agency is responsible for determining the qualifications, training, and currency requirements for Pilots in Command (PICs), Visual Observers (VOs), and any other required crewmembers. Skydio recommends two approaches for self-certifying flight crewmembers:

1. Training based on the FAA Remote Pilot Certificate
 - a. Require all PICs to first acquire their FAA Remote Pilot Certificate
 - i. **Note:** This ensures that the PICs would be dual-qualified to operate under a COA or Part 107 regulations
 - b. Conduct additional in-house training on operating under a COA in addition to agency policies, procedures, and tactics
2. Training not based on the FAA Remote Pilot Certificate
 - a. Develop a curriculum that includes ground and flight lessons and covers the spectrum of aeronautical knowledge and skills that crewmembers need to safely operate drones for the agency
 - i. **Note:** Without a Remote Pilot Certificate, the agency would not be able to have their PICs conduct operations under Part 107
 - b. Skydio can help develop this curriculum with on-staff Certified Flight Instructors

In both approaches, the agency should develop a set of policies and procedures for how the agency's drone program will be run and how crewmembers will conduct operations.

For the purposes of the COA application, the following is how to fill out the Flight Aircraft Qualification page:

	Pilots	Observers
Private (Written)	No	No
Private (Certified)	No	No
Instrument	No	No
Commercial	No	No
Air Transport	No	No
Unique Trained Pilot	Yes	Yes
Describe for Each	Pilot will hold either a Part 107 certificate or training and	Observer will receive training on FAR Part 91.

Request to Operate Above UASFM Altitudes

	certification provided by the public agency.	
DOD Certified / Trained	No	No
Other Certified Training	No	No
Trained on FAR Part 91 Reqs	Yes	Yes

Medical Certification Class	Other	Other
Currency Status	Proponent will ensure pilot is medically qualified to fly UAS.	Proponent will ensure observer is medically qualified to fly UAS.
Duty Time Restrictions	Duty time restrictions are based on agency policies.	Duty time restrictions are based on agency policies.

Single UAS Control	Yes	Yes
---------------------------	-----	-----

Save and Next

➔ Special Circumstances

In this box, Skydio recommends reiterating your agency has an approved Part 91 BVLOS waiver and that this airspace authorization request is to operate above certain UASFM altitudes. It's recommended to type the following in the text box:

[AGENCY NAME] requests the ability to routinely operate above the UAS Facility Map altitudes of [APT ID] in accordance with the submitted map and in accordance with approved Part 91 BVLOS waiver [BVLOS WAIVER REFERENCE NUMBER].

The approved Part 91 waiver includes a provision as follows:

Flights above 400 Feet (AGL) in Class G airspace, above the UASFM grid heights, or in controlled airspace where UASFM's are not applicable, must ALSO obtain an airspace authorization through CAPS/CADZ

Save and Next

➔ Review Documents

Review the attached documents in the list on this page. The following list is all the documents referenced above that were uploaded in their respective pages:

- **Public declaration letter** (Declarations page)
- **Airworthiness statement** (UAS Platform pages)
- **Lost link procedures** (UAS Platform pages)
- **Emergency procedures** (UAS Platform pages)
- **Lost Comms** (UAS Platform pages)

Note that not all documents from the UAS Platform section may show up in this list. It is OK to re-upload them here to be sure they are included in the application.

Save and Next

➔ Preview COA

Review all the information in the application on this page for accuracy. If you see any mistakes or errors, use the page links on the left side to navigate back to a page and correct the issue. Also check that all the pages on the left sidebar have a check mark next to them and not an “x”. If any page has an “x”, navigate to that page and fix the error.



NOTE: Information on the UAS Platform pages cannot be changed at this point. If you notice an error in the UAS Platform section, you may have to create an entirely new aircraft.

➔ Submit!

When you are ready, hit the “Submit” button at the bottom! A pop-up will appear indicating which service area will process your COA. Select the area that your jurisdiction resides in by referencing the map in the pop-up window.

➔ Processing Time

Processing time can vary for this type of airspace authorization request. Monitor your email for any correspondence from the FAA.

Additional Resources

References

The following FAA sources were used to develop this guidance and can provide additional details:

- [Starting a drone program](#)
- [Overview of Part 107](#)
- [FAA Advisory Circular 107-2](#)
- [FAA Public Safety Toolkit](#)
- [Registering Your Drone](#)
- [Skydio Support Article for Registering Skydio drones](#)
- [FAA Advisory Circular 00-1.1B](#)
- [2021 Public Aircraft Training Flight Interpretation](#)
- [2023 Interpretation on Governmental Function](#)

Acronyms

FAA	Federal Aviation Administration
COA	Certificate of Authorization
COW	Certificate of Waiver
PSO	Public Safety Organization
PDL	Public Declaration Letter
BVLOS	Beyond Visual Line of Sight
DFR	Drone as First Responder
PAO	Public Aircraft Operator
CAPS	COA Application Processing System
ConOp	Concept of Operation

Feedback and Questions

If you find an error in this guide, have recommendations for improving it, or have questions, let us know by contacting the Skydio Regulatory Team at aviation_regulatory@skydio.com.

Appendices

A. Public Declaration Letter Example

Attorney official letterhead		City of Teles		
Letter is dated		August 16, 2024		
		Federal Aviation Administration Unmanned Aircraft Tactical Operations, AJV-115 490 L'Enfant Place SW, Suite 7105 Washington, DC 20024		
		RE: Public Declaration Letter for the Teles Police Department's Application for Operation of Unmanned Aerial System Certificate of Authorization (COA)		
		To Whom It May Concern:		
The individual making the declaration and the agency for which the declaration is for are identified		I am the elected City Attorney for the City of Teles. This letter is in response to the status certification of the Teles Police Department, pursuant to sections 40102 and 40125 of Title 49 of the United States Code.		
40102(a)(41)(C) and the appropriate references to state statute(s) are noted to declare the agency is a political subdivision of the state for the purposes of public aircraft operations		For the purposes of section 40102(a)(41)(C), which defines "public aircraft", the Teles Police Department is a component part of the City of Teles, which is a political subdivision of the State of North Dakota. The City of Teles is a home rule municipality authorized by Article VII of the Constitution of North Dakota and enabled as a municipal corporation by Appendix B of Teles Code of Ordinances.		
A declaration referencing 40125(b) that the agency will not operate for commercial purposes (compensation or hire)		The Teles Police Department will operate its unmanned aircraft systems in accordance with section 40125(a)1 and 40125(b) of Title 49 of the United States Code and will not conduct operations for commercial purposes (compensation or hire).		
Points of contact for the Attorney and agency.		Please do not hesitate to contact: <table border="0"><tr><td>John Doe City of Teles Attorney 100 1st Street (123) 456-7890 john.doe@email.gov</td><td>Jane Doe Teles PD Program Manager 200 2nd Street (123) 456-7890 jane.doe@email.gov</td></tr></table>	John Doe City of Teles Attorney 100 1 st Street (123) 456-7890 john.doe@email.gov	Jane Doe Teles PD Program Manager 200 2 nd Street (123) 456-7890 jane.doe@email.gov
John Doe City of Teles Attorney 100 1 st Street (123) 456-7890 john.doe@email.gov	Jane Doe Teles PD Program Manager 200 2 nd Street (123) 456-7890 jane.doe@email.gov			
Signature block of the individual making the declaration		Sincerely, [SIGNATURE] John Doe City of Teles Attorney		

B. Small Unmanned Aircraft Airworthiness Statement Example

Agency official letterhead	 Teles Police Department
Letter is dated	Effective Date: August 16, 2024
List of aircraft being declared airworthy for PAO	Public Aircraft Make and Model: Skydio X10
Statement that the aircraft are airworthy and will be maintained in a condition for safe operation in the National Airspace System.	The listed aircraft are public use aircraft which are flown, owned, and operated by Teles Police Department. Teles Police Department acknowledges and accepts all responsibility for ensuring airworthiness of these aircraft. Teles Police Department has determined that the above listed aircraft are airworthy when used in accordance with the manufacturer's recommendations and are capable of operating in compliance with the applicable requirements in 14 CFR Part 91. Additionally, the aircraft will be maintained in a condition for safe operation while operating within the National Airspace System (NAS) for the duration of the Certificate of Authorization (COA).
Declaring that operations will be conducted as Public Aircraft Operations	Limitations: The following declarations must be adhered to for all operations conducted under this Airworthiness Release: • Teles Police Department declares that operations meet the definition of public aircraft operations as defined in 49 USC § 40102(a)(41)(C). • Teles Police Department certifies that all flights made under the authority of the Certificate of Waiver or Authorization will be conducted in accordance with the limitations of public aircraft statute 49 USC § 40125, including the limitations on commercial purpose which prohibit reimbursement for flights.
Signature block of the individual making the declaration	[SIGNATURE] John Smith Teles Police Department Drone Program Manager

