COP 1500 Drone Use Policy

Effective 11/18/26

1. Purpose

1. The City of Tulsa is committed to embracing emerging technologies that improve service delivery to the public while protecting privacy and safety.

2. The use of small unmanned aircraft systems (SUAS) technology by the City is intended to enhance existing departmental capabilities and services, benefiting the public through the efficient, safe, and secure use of City resources.

3. The purpose of this document is to establish City policy for the use of SUAS technology. It defines the responsibilities for the use of SUAS to ensure that these technologies serve their intended purpose while limiting risks to the City of Tulsa, employees, residents, and the public.

2. Scope

1. This policy applies to SUAS, as defined in FAA Part 107, and excludes ground-based, maritime, or subterranean robotics unless addressed in separate policies.

2. Unless specifically exempted, this policy applies to all users who use, manage, or interact with the City's SUAS, including employees, contractors, temporary staff, and third-party partners.

3. Authority

1. This policy is issued under the authority of the Mayor of the City of Tulsa.

2. The City of Tulsa reserves the right to enforce this policy and take appropriate action to ensure compliance and alignment.

3. This policy is considered a City Operating Policy, COP Section 1500, which requires compliance from all users defined in Section II. Provision 2. All employees must comply with any relevant collective bargaining agreement as well as Personnel Policies and Procedures Manual sections (PPPM), as applicable.

4. Failure to comply with this policy may be regarded as a violation of work rules, as outlined in the Personnel Policies and Procedures Manual (PPPM), Section 411.

Violation of this policy may result in disciplinary action up to and including termination of an employee, and/or contract termination with any contractors, subcontractors, consultants, or vendors, and/or other appropriate legal action as it concerns both employees and other authorized users.

4. Policy Review

1. This policy will be subject to periodic review directed and approved by the Technology Governance Board (TGB)to ensure its effectiveness and relevance. Updates or revisions will be made as needed to align with the evolving needs and goals of the City of Tulsa and the development of SUAS technology.

2. Any requests for exceptions or modifications to this policy shall be submitted in writing to the TGB. Requests will be reviewed on a case-by-case basis.

5. Oversight & Guidance

1. The TGB will maintain oversight of City SUAS use in accordance with the TGB Charter. This includes:

.11 Approve use cases

.12 Set standards for internal reporting on City SUAS use in partnership with departments.

.13 Conduct periodic audits of City SUAS use.

2. Departments must follow the City of Tulsa Communications policy in public engagement.

3. All users who access, manage, or interact with the City's information systems, including employees, contractors, temporary staff, and third-party partners must also comply with COP 1200, Enterprise IT Security Policy Manual.

6. Compliance and Certification

1. Departments must comply with all state and federal laws.

2. Departments must comply with all applicable federal regulations, including but not limited to the Federal Aviation Administration (FAA) regulation Part 107 and the Federal Communications Commission (FCC) regulations.

3. Departments must protect all state and federal constitutional guarantees.

4. All City SUAS pilots must be FAA Part 107-certified or under direct supervision of a remote pilot in control.

5. All City SUAS must be clearly marked with FAA registration number and identified as property of the City of Tulsa.

6. No personal use of SUAS for City operations is permitted.

7. Departments must only operate SUAS for TGB-approved use cases.

.71 Use Cases describe how SUAS will be used, the business and/or operational benefits of the use case and describe risks and mitigation measures. Use cases apply City-wide unless otherwise specified.

.72 Departments must submit Use Cases to the TGB for review and approval as needed, using the Use Case Template (Appendix 1).

.73 If the department has an urgent need to operate a new Use Case prior to its approval, they must request an expedited vote by TGB.

.74 Operations for emergency or extenuating circumstances shall be conducted at the discretion and determination of department head or designee and in a manner consistent with City and department policies and procedures.

8. Prohibited uses include the following:

.81 Any use that violates federal, state, or local laws, regulations, or ordinances.

.82 Use of personal SUAS equipment during City of Tulsa operations.

.83 In conditions that exceed the manufacturer's recommended specifications.

.84 To intentionally pursue, harass, disturb or destroy wildlife unless that is the intent and purpose of the mission.

9. Departments must only collect data necessary for approved use cases. Departments must follow the City of Tulsa data governance policies. See Section VII.7. for more detail on data collection and processing.

7. Operational Requirements

1. Departments may adopt a departmental drone policy that meets or exceeds the standards listed in this document.

2. Departments must adopt a departmental drone operational plan that describes how it will comply with this policy. Template with minimum requirements is available in Appendix 2. A department may add requirements to this operational plan but not remove them.

3. Departments must designate a SUAS point of contact for departmental operations. The department head may choose to designate a SUAS Program Administrator. Departments must maintain the list and contact information for these individuals in a shared folder (Use Drone Information Sharing folders).

4. Departments must maintain all applicable certifications and obtain waivers and authorizations as needed.

5. Departments must:

.51 Maintain and keep all SUAS assets in working order and keep a log of maintenance history.

.52 Establish a pilot proficiency program, informed by national standards such as NIST, to ensure that all pilots can operate SUAS technology proficiently and in compliance with FAA Part 107 regulations.

.53 Ensure that all departmental drone operations comply with approved Use Cases.

.54 Maintain an inventory of relevant drone assets. Include SUAS make, model, and serial number; FAA registration number; and operational status.

.55 Maintain a list of all department-authorized pilots.

.56 Maintain flight logs.

.57 Contractors, temporary staff, and third-party partners who pilot SUAS on behalf of the City must hold liability insurance and workers' compensation insurance.

6. Incident and Accident Procedures. Departments must establish procedures to:

.61 Adhere to the City's established protocols described in Personnel Policies and Procedures. Any SUAS-related incident, including property damage, personal injury, injury near-miss events, equipment malfunction, or data breach, must be treated as a reportable event.

.62 Determine if the incident meets FAA Part 107 criteria for mandatory reporting and file required reports to the FAA within the required period.

7. Data collection, access, processing, and use. This section applies to SUAS-generated data such as video, images, telemetry, geolocation data, and metadata). Departments must:

.71 Follow the City's Data Classification Policy and protect collected data with safeguards appropriate for its classification level.

.72 Minimize collection of personally identifiable information (PII) when possible.

.73 Take reasonable steps to protect privacy, consistent with each approved use case.

.74 Store data on City-approved systems.

.75 Restrict access to authorized personnel with a legitimate business need.

.76 Follow the City's records retention and destruction policies. This Policy does not supersede or exempt the City's requirements under other applicable laws, including contractual, legal, or regulatory obligations such as the Oklahoma Open Records Act. 51 O.S. §§ 24A.1 et seq.

8. Cybersecurity. Departments must:

.81 Ensure that the hardware and software used to operate SUAS meet minimum network, data security, and cybersecurity standards set by City IT Security. This includes:

.811 Use of secure communication protocols and encryption,

.812 Firmware updates only from verified sources,

.813 Purchase SUAS from US federal government-approved vendors (such as BlueSUAS or Green SUAS list maintained by the Defense Contract Management Agency, or equivalent). SUAS manufacturers not on a US federal government-approved list must undergo pre-purchase risk evaluation of drone vendors and supply chains in collaboration with IT Security. Any denial, approval or exception must be handled first by COP section 1200, as amended or replaced, or any successor City IT security policy or procedure. These controls mitigate the risks of data exfiltration and unauthorized remote access.

.82 Keep software up to date and maintained.

.83 Report repeated or persistent incidents involving unusual behavior of City-owned SUAS to the departmental SUAS point of contact, IT Security, and City Safety as soon as possible.

8. Definitions

1. Small unmanned aircraft system (SUAS) means a small unmanned aircraft, - that operates without the possibility of direct human intervention from within or on the aircraft, that is less than 55 lb on takeoff - and its associated elements (including communication links and the components that control the small unmanned aircraft) that are required for the safe and efficient operation of the small unmanned aircraft in the national airspace system.[1]

2. Visual observer means a person who is designated by the remote pilot in command to assist the remote pilot in command and the person manipulating the flight controls of the small SUAS to see and avoid other air traffic or objects aloft or on the ground.

3. Remote pilot is an individual with a FAA Remote Pilot Certificate who has the authority and responsibility to safely operate small Unmanned Aircraft Systems (SUAS) for commercial or non-recreational purposes under 14 C.F.R Part 107.

4. Remote pilot in control means the person ultimately responsible and the final authority for a small Unmanned Aircraft (SUAS) operation, designated before or during flight, ensuring compliance with rules, managing crew, and making all pre-flight, in-flight, and post-flight decisions, even supervising others manipulating controls. This individual must

[1] https://www.ecfr.gov/current/title-14/chapter-I/subchapter-F/part-107

hold a Remote Pilot Certificate, demonstrating knowledge of regulations for safe operation, which involves ensuring no hazard to people or other aircraft, and coordinating with crew for airspace awareness and collision avoidance.

5. Departmental SUAS point of contact means a departmental staff member who responds to requests or questions about the departmental drone program.

6. Departmental SUAS Program Administrator means a departmental staff member who has responsibilities for departmental drone program administration.

This policy will take effect on the date approved by the Mayor and supersedes any previous policies or guidelines related to departmental policies within the City of Tulsa.

Appendix 1: SUAS Use Case Proposal Template

Section I: Overview	
Sponsoring department:	
Name of use case:	
Is this use case currently in operation?	
Has funding been identified for this use case?	
Is this a law enforcement or emergency response use case?	
Provide a short description of how SUAS will be used in this use case (3-5 sentences, using layman's terms):	
Describe the business and/or operational benefits of this use case:	

Section II: Risk Assessment		
Risk Type (check all that apply)	**Description of Risk for this Use Case**	**Mitigation Measures for this Use Case**
☐Safety Risk *(the potential for harm or damage to health or property)*		
☐Privacy Risk *(the potential for compromising the privacy of individuals, including their data)*		
☐Civil Liberties Risk *(the potential for infringing on individuals' fundamental rights and freedoms)*		
☐Technical Risk *(the potential for malfunctional or failure impacting SUAS ability to meet performance requirements or operate safely)*		
☐Reputational Risk *(the potential harm to an organization's credibility or public image stemming from negative public perception related to their SUAS operations)*		

Appendix 2. Departmental drone operational plan template

City of Tulsa
Departmental UAS Operations Plan Template (Draft)

OBJECTIVE

To ensure the use of Small Unmanned Aircraft Systems (SUAS) is conducted in a safe, effective, efficient, and legally compliant manner in support of departmental operations.

OPERATIONAL GUIDELINES

The department will maintain equipment and qualified personnel to utilize SUAS technology as a resource to improve safety, enhance situational awareness, improve operational efficiency, support emergency response, collect data, and accomplish approved departmental missions. This plan may be supplemented with mission-specific procedures.

PROGRAM RESPONSIBILITIES

Department Head: Authorizes participation and designates program leadership.

UAS Program Administrator: Maintains records, tracks training, manages inventory, and serves as liaison to the Technology Governance Board (TGB).

Remote Pilot in Command (RPIC): Responsible for safe flight operations and regulatory compliance.

Visual Observer (VO): Assists with situational awareness and hazard identification.

FLIGHT TYPES

Departments shall identify and maintain approved use cases consistent with the City of Tulsa Drone Use Policy. Examples include inspections, documentation, emergency response, environmental monitoring, engineering support, training, public safety support, and other approved missions.

FLIGHT REQUIREMENTS

Flight planning shall consider mission objectives, location, weather, airspace requirements, operational risks, signal strength, line-of-sight requirements, and FAA compliance. All operations shall comply with applicable FAA regulations and City policy.

SCENE REVIEW

The RPIC shall identify hazards including takeoff and landing concerns, obstacles, public access areas, traffic, utilities, environmental conditions, and potential sources of interference.

FAA REQUIREMENTS / CERTIFICATIONS

All pilots shall maintain a valid FAA Part 107 Remote Pilot Certificate when required and comply with applicable FAA regulations, waivers, authorizations, and operational limitations.

AIRCRAFT MAINTENANCE

The department shall maintain aircraft in accordance with manufacturer recommendations and maintain records of inspections, repairs, firmware updates, battery history, and equipment status.

INCIDENT REPORTING

The RPIC shall report incidents to the department's Program Administrator or Point of Contact including injury, property damage, fly-away events, equipment malfunctions, loss of communication, near misses, cybersecurity incidents, and any event requiring FAA notification.

[Specify departmental procedures for complying with the City Drone policy's incidents and accidents procedures, section 6.]

DATA MANAGEMENT

Any recordings obtained via SUAS will be collected, stored and documented in accordance with current existing City and departmental Policies and Procedures.

[Specify your department's recording, data storage and security requirements.]

CHECKLISTS *[Modify checklists as needed for departmental operations]*

PRE-DEPLOYMENT CHECKLIST

Prior to deployment, the Remote Pilot in Command (RPIC) shall:

Verify the mission aligns with an approved use case.
Determine whether the mission will be conducted under FAA Part 107, a Certificate of Authorization (COA), waiver, or other approved authority.
Verify airspace requirements and obtain necessary authorizations.
Review weather conditions and forecast.
Assess mission risks and operational considerations.
Assemble the flight team, including Visual Observer(s) if needed.
Verify aircraft, batteries, payloads, and supporting equipment are available and mission ready.
Brief flight personnel on mission objectives and safety considerations.

PRE-FLIGHT CHECKLIST

Upon arrival at the operational area, the RPIC shall:

Conduct a site assessment.
Identify hazards including trees, structures, power lines, traffic, water hazards, and public access areas.
Establish a safe takeoff and landing area.
Verify communication procedures among flight personnel.
Inspect aircraft frame, motors, propellers, and payloads.
Verify batteries are adequately charged and in good condition.
Verify controller and software functionality.
Confirm GPS and communication signal strength.
Verify FAA authorizations remain valid.
Verify weather conditions remain suitable for flight.
Conduct crew briefing.
Announce “Clear Props.”
Verify launch area is clear.
Announce “Clear Launch.”
Launch aircraft.

IN-FLIGHT CHECKLIST

During flight operations, the RPIC shall:

- Maintain visual line of sight.
- Monitor aircraft status and battery levels.
- Monitor airspace for potential conflicts.
- Monitor weather and environmental conditions.
- Maintain communication with flight team members.
- Operate within approved mission parameters.
- Terminate operations if unsafe conditions develop.

POST-FLIGHT CHECKLIST

Upon completion of flight operations, the RPIC shall:

- Land aircraft safely.
- Power down aircraft.
- Power down controller.
- Inspect aircraft for damage or abnormalities.
- Remove and secure batteries.
- Remove and secure payload equipment.
- Store equipment appropriately.
- Upload imagery, video, and collected data to approved City systems, if applicable.
- Document flight information.
- Record battery usage.
- Record maintenance issues or discrepancies.
- Submit required flight records.

INCIDENT CHECKLIST

If an incident occurs:

- Ensure safety of personnel and the public.
- Secure the operational area if necessary.
- Notify supervisor.
- Notify UAS Program Administrator or Point of Contact.
- Preserve flight records and data.
- Document incident details.
- Determine whether FAA reporting requirements apply.

Complete required City and departmental reporting procedures.

MAINTENANCE CHECKLIST

Following flight operations or scheduled maintenance:

- Inspect aircraft frame.
- Inspect motors and propellers.
- Inspect landing gear.
- Verify payload operation.
- Check battery condition.
- Verify firmware status.
- Record maintenance actions.
- Remove unsafe aircraft from service until repaired.

PERIODIC REVIEW

This operational plan shall be reviewed and updated by the TGB as necessary to ensure compliance with City and departmental policy, operational needs, and regulatory requirements.

REFERENCE DOCUMENTS

City of Tulsa Drone Use Policy
City IT Security Policies
City Data Governance Policies
FAA Part 107
Approved Drone Use Cases