
Changes to Unmanned Aircraft System (UAS) Registration Marking Requirements

On February 13, 2019, the Federal Aviation Administration (FAA) published a change to unmanned aircraft registration marking requirements. In previous rulemaking, the FAA had established an online registration process for operator convenience noting the requirement that unmanned aircraft display the registration number in a readily accessible part of the aircraft. An allowance was made permitting the registration number to be in an enclosed compartment (e.g. battery compartment). That allowance is eliminated by the current new rule. Registration markings for unmanned aircraft must, as of February 25, 2019, be “legibly displayed on an external surface of the small unmanned aircraft.” The new rule is a change to FAR Part 48 (not FAR Part 107) and as such applies essentially to all unmanned aircraft (see [Part 48](#) for specific applicability). The complete final rule can be found [here](#).

The FAA is proposing a change to 14 CFR Part 107 regarding operation of unmanned aircraft over people or at night. Both types of operations are currently permitted only with a specific waiver from FAA. The FAA’s proposal is to remove the waiver requirement provided specific conditions are met. For night operations, these proposed requirements include functioning anti-collision lighting on the aircraft and operator training specific to night operations. Operations over people (meaning people on the ground not part of the UAS operation) would be permitted for aircraft weighing less than 0.55 lb (with payload) without restriction as soon as the rule goes into effect. Operation of heavier aircraft over people would be permitted only upon demonstration of compliance with a number of new requirements. These include various design requirements such as not having any exposed rotating parts that could cause injury as well as operational requirements in some circumstances. Compliance with the design requirements would have to be demonstrated by the aircraft manufacturer. NATA staff is reviewing the proposal in detail and will advise members of significant changes. The complete proposal can be found [here](#).

NATA is reviewing a lengthy list of questions published recently by FAA and covering a wide range of topics regarding UAS design and operation. FAA is trying to determine if rulemaking is necessary, in the interest of both public safety and national security, in specific areas including standoff distances for operations, payload requirements, Unmanned Traffic Management (UTM) operations, various performance limitations (e.g. airspeed or altitude) and the need for critical system design requirements. The potential for rulemaking in these areas is part of FAA’s long-standing policy of ensuring an appropriate regulatory framework exists as UAS become more sophisticated and capable and as UAS operational data begin to establish a well-defined safety record for UAS. The complete proposal can be found [here](#).