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MCIWEST-MCB
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MCIWEST-MCB ORDER 3710.1

From: Commanding General
To: Distribution List

Subj: OPERATION OF GROUPS 1 AND 2 SMALL UNMANNED AIRCRAFT SYSTEMS ABOARD
MARINE CORPS INSTALLATIONS WEST-MARINE CORPS BASE, CAMP PENDLETON
INSTALLATIONS AND WITHIN ASSOCIATED AIRSPACE

Ref: (a) MCO 5400.54
(b) Title 49, Transportation §40102
(c) SECNAVINST 3700.2
(d) Requirements and Guidance for Access to and
Operations Within United States Civil Airspace by
Department of the Navy Unmanned Aircraft Systems
(e) MCO 3800.2
(f) Public Law 112-95
(g) U.S. Department of Transportation FAA AC 91-57C,
Exception for Limited Recreational Operations of
Unmanned Aircraft
(h) Title 49, Transportation §44809 Exception for Limited
Recreational Operations of unmanned Aircraft
(i) Title 14, CFR Part 91, General Operating and Flight
Rules
(j) Title 14, CFR Part 107, Small Unmanned Aircraft
Systems
(k) COMNAVAIRFOR M-3710.9
(l) MOU between DOD and FAA
(m) ALNAV 074/18, Guidance on Procurement and Operation
of Unmanned Aircraft Systems
(n) NAVMED 6410/13, Unmanned Aircraft System (UAS) Groups
1 and 2 Physical Worksheet
(o) Memo for the Under SECDEF of 13 Oct 22
(p) MARADMIN 284/24, Clarification of Group 1 and 2
Unmanned Aircraft Systems (UAS) Policy for the
Operation of USMC Small (UAS)
(q) NAVMC 3500.107
(r) COMMCICOM ltr 3700 MCIC of 14 Oct 22
(s) MEMO for the Dep SECDEF of 16 Nov 18 (U/FOUO)
(t) Change 126, Manual of the Medical Department U.S.
Navy NAVMED P-117
(u) OPNAVINST 3750.6
(v) OPNAVINST 3500.39
(w) NAVAIRINST 13034.1
(x) Title 14, CFR Part 99, Security Control of Air Traffic

DISTRIBUTION STATEMENT A: Approved for public release; distribution is
unlimited.

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- (y) FAA/DOD J-SOP for UAS Specific SSI
- (z) Addendum to the FAA/DoD J-SOP for UAS Specific SSI
Procedures for Approving Access

1. Situation

a. This Order provides guidance on Small Unmanned Aircraft Systems (sUAS) integration among Marine Corps Installations West-Marine Corps Base, Camp Pendleton (MCIWEST-MCB CAMPEN) installations and units within the assigned regional area of operations (AO) in accordance with references (a) through (z).

b. sUAS support a range of operations related to installation mission essential tasks. Specifically, sUAS aerial imagery acquisition capabilities may be leveraged to effectively accomplish installation management functions; assist in personnel search and rescue; allow overhead surveillance for Special Reaction Teams (SRTs); and provide a persistent overhead observation capability for special events, waterside security, wildfire response, natural disaster assessment, or crash site assessment.

c. The introduction of sUAS presents new procedural, safety, and security challenges for Installation Commanders. The first step towards effectively operationalizing sUAS capabilities is the establishment of procedures governing their employment. This Order provides guidance for the implementation of Group 1 and Group 2 sUAS operations aboard MCIWEST-MCB CAMPEN installations.

d. Commander, Marine Corps Installations Command (COMMCICOM) is the Service Level headquarters for MCIWEST-MCB CAMPEN and is the Designated Approval Authority responsible for sUAS operations.

e. I Marine Expeditionary Force (I MEF) is supporting and MCIWEST-MCB CAMPEN is supported in the execution of installation protection.

f. CG MCIWEST-MCB CAMPEN has a supporting-supported relationship with Service Level Training Installation's (SLTIs), CG MCRD San Diego, CG MAGTFTC/MCAGCC, and Commanding Officer, MCMWTC.

g. CG MCIWEST-MCB CAMPEN will request Commander Navy Medical Forces Pacific (CDRNAVMEDEFORPAC) Medical Treatment Facilities to be prepared to provide expanded health care service support if required.

2. Mission. MCIWEST-MCB CAMPEN provides regional guidance for employment of Group 1 or 2 sUAS near term and during the Future Years Defense Program (FYDP) aboard assigned installations or within delegated airspace in order to ensure coordination and execution are conducted safely, securely and in accordance with published references.

3. Execution

a. Commander's Intent

(1) Purpose. To integrate Group 1 and 2 sUAS operations safely and efficiently into the conduct of MCIWEST's mission essential tasks.

(2) Method. Based on current regulations and instructions listed, this Order provides guidance and requirements for Commanders. Although this Order establishes minimum requirements, it does not restrict commands from establishing more stringent requirements based on unique command challenges and mission requirements. Federal and Department of Defense (DoD) sUAS policy, regulations, and guidance will continue to evolve. All commands are responsible for monitoring public law, as well as Federal regulations and DoD guidance on sUAS operations.

(3) Endstate. Group 1 or 2 sUAS operations are conducted safely, securely and in accordance with this order and published references.

b. Concept of Operations. MCIWEST-MCB CAMPEN provides regional guidance for employment of Group 1 or 2 sUAS near term and during the FYDP aboard assigned installations or within delegated airspace in compliance with established policies, procedures, and higher headquarters guidance. Deviations from procedures and instructions must be approved by, or referred to, the CG MCIWEST-MCB CAMPEN (Attn: Assistant Chief of Staff (AC/S), G-3/5).

c. Tasks. Marine Corps Air Station (MCAS) Yuma, MCAS Camp Pendleton (MCAS CampPen), Marine Corps Base, Camp Pendleton (MCB CampPen), Marine Corps Logistics Base (MCLB) Barstow, MCAS Miramar:

(1) Develop and publish guidance to ensure any Group 1 or 2 sUAS use aboard installations, or within delegated airspace, is done safely, securely, and is executed in accordance with the references and this Order.

(2) Retain approval authority for sUAS operations within the airspace above their installation and ensure the safe operation of sUAS therein.

(3) Implement a sUAS safety policy that meets the requirements of this Order and other applicable orders.

(4) Integrate risk management strategies into appropriate planning, orders, training and indoctrination programs, technical and tactical publications, checklists, and Standing Operating Procedures (SOPs).

(5) Serve as Aircraft Reporting Custodians (ARC) for Group 1 and 2 sUAS activities within their command, where applicable.

(6) Meet applicable Training and Readiness standards and the associated proficiency and currency requirements for the establishment and maintenance of a unit sUAS program.

d. Coordinating Instructions

(1) This order is applicable to tenant commands and organizations, transient units, and other activities, including contractors, operating aboard MCIWEST installations and/or within managed ranges.

4. Administration and Logistics. Directives issued by this Headquarters are published and distributed electronically. Electronic versions of MCIWEST-MCB CAMPEN directives can be found at: <https://usmc.sharepoint-mil.us/sites/mciwest/SitePages/G1Hub.aspx>.

5. Command and Signal

a. Command. This order is applicable to tenant commands and organizations, transient units, and other activities, including contractors, operating aboard MCIWEST installations and/or within managed ranges.

b. Signal. This Order is effective the date signed.



C. E. DUDIK
Chief of Staff

DISTRIBUTION: A-3
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Chapter 1

General

1. Scope. This Order outlines procedures for sUAS operations aboard Marine Corps Installations West-Marine Corps Base, Camp Pendleton (MCIWEST-MCB CAMPEN) regional commands and within delegated airspace. Compliance with stipulated procedures is mandatory, except as authorized herein. This Order does not waive or supersede requirements mandated by the references, or any other orders or instruction. Installation Commanders and personnel involved in the planning or conduct of Small Unmanned Aircraft Systems (sUAS) operations are required to be familiar with and comply with the provisions of this Order as it pertains to their operational duties and responsibilities.

2. Distribution. This Order is distributed to all installations under the cognizance of the Commanding General (CG), MCIWEST-MCB CAMPEN.

3. Changes and Updates. Changes to this Order shall be made by the CG MCIWEST-MCB CAMPEN, as necessary.

4. Point of contact. Assistance with matters discussed in this Order may be directed to the Regional sUAS Program Manager, MCIWEST-MCB CAMPEN Regional Aviation Office, (760) 763-6414 or via email at MCIWEST_G35_Aviation@usmc.mil.

5. Word Usage and Definitions

a. "Shall" is used when application of a procedure is mandatory.

b. "Should" is used when application of a procedure is recommended.

c. "May" and "need not" are used only when application of a procedure is optional.

d. "Will" indicates futurity and never indicates any degree of requirement for application of a procedure.

e. The Federal Aviation Administration (FAA) definition of sUAS are aircraft weighing less than 55 pounds, operated without the possibility of direct human intervention from within or on the aircraft.

f. Program-of-Record System (PoR). A Program-of-Record system is funded across the Future Years Defense Program (FYDP), through the Program Objectives Memorandum (POM). Generally, PoR systems are provided by an acquisition organization, such as a Program Executive Officer (PEO) program office or systems command, and come complete with training modules, maintenance procedures, and instructional manuals.

g. Non-Program-of-Record System. Non-PoR systems are those not acquired or funded through the POM process. These are normally commercial off-the-shelf (COTS) systems that can be procured with unit funds. This category also includes emerging or interim solutions rapidly fielded via Urgent Universal Needs Statements (U-UNS) not yet fully vetted or formally acquired PoR systems.

h. Reference (c) defines aircraft operations in the National Airspace System (NAS) as either Public Operations or Civil Operations.

(1) Per reference (d), the Department of the Navy (DON) considers an unmanned aircraft system (UAS) operation to be "public" when the UAS is owned, leased, or operated by a DON activity. Certain contracted aircraft operations are considered to be DON Public Aircraft Operations while conducting missions for the DON. The determination of whether a particular contracted use is a public operation or a civil operation depends on multiple factors, to include ownership, configuration, and the purpose of the mission being conducted. Contact the Naval Air Systems Command Airworthiness and Cybersafe Office Global Customer Support Team at airworthiness.gm.fct@navy.mil to request a determination on whether a contracted UAS operation is public or civil.

(2) Per reference (c), any sUAS operation that does not meet the statutory criteria for a public aircraft operation is considered a Civil Operation. Civil Operations must be conducted in accordance with all FAA regulations applicable to the operation.

i. U.S. Civil Airspace. The DON defines U.S. Civil Airspace, in reference (e), as U.S. territorial airspace, excluding active Restricted and Warning Areas used by civil and government aircraft primarily for navigational purposes.

j. sUAS Proponent. The sUAS Proponent is the O-5 level or above Commanding Officer (or civilian equivalent) overseeing the organization conducting or sponsoring the sUAS activity.

k. Department of Defense (DoD) sUAS Groups

Category	Weight (lbs)	Maximum Altitude (AGL)	Maximum Speed (KTS)
Group 1	0-20	<1,200'	<100
Group 2	21-55	<3,500'	<250

Chapter 2

Small Unmanned Aircraft Systems (sUAS) Operation Types

1. Authorization of sUAS Operations, by Type. sUAS operator and system requirements vary based on the sUAS operator and whether the operation is determined to be Public or Civil. In accordance with Department of Defense (DoD)/Federal Aviation Administration (FAA) regulations, and in compliance with applicable DoD orders and Base/Station regulations, Installation Commanders may approve the conduct of sUAS operations above their installation's property, provided the proponent substantiates that its operators and systems are in compliance with the provisions outlined below.

a. Public Operations

(1) The proponent possesses a valid airworthiness certification for each sUAS to be operated.

(2) All sUAS operators and crewmembers are qualified by the appropriate Aircraft Reporting Custodians (ARC) and are current in the applicable type/model/series (T/M/S).

(3) All sUAS operators are medically qualified to perform the activity.

(4) The proponent possesses frequency approval from the Marine Corps West-Marine Corps Base, Camp Pendleton (MCIWEST-MCB CAMPEN) G-6/Regional Spectrum Management Branch.

(5) All imagery collected during the conduct of public operations above MCIWEST-MCB CAMPEN installations shall be done so in accordance with reference (f).

b. Civil Operations

(1) The sUAS operator possesses a current, valid FAA Remote Pilot Certificate.

(2) The proponent possesses frequency approval from the MCIWEST-MCB CAMPEN G-6/Regional Spectrum Management Branch.

Note: Per reference (b), sUAS purchased by and operated by individual Marines for off-duty hobby or recreational use are not public aircraft and shall not be operated for official purposes.

(3) Video and Photography

(a) Unless specifically authorized by the Installation Commander, the capturing of video or still images during civil sUAS operations are prohibited.

(b) Installation Commanders shall establish specific guidance and policies regarding requests for capturing data (i.e., video, still images, and special imaging technology) from sUAS to support mission requirements in line with current photography policy and guidelines, and subject to anti-terrorism/force protection (AT/FP) and mission assurance (MA) interests.

(c) Except as otherwise permitted by the Installation Commander, and unless a law enforcement agency first obtains a search warrant authorizing the use of a sUAS, no person, entity, or agency may use a sUAS to photograph private real property, use special imaging technology, conduct surveillance of a person or dwelling occupied by a person or that dwelling's curtilage without the person's consent.

(d) sUAS operators shall disable all video and still image collection capabilities the aircraft may possess prior to operation aboard MCIWEST-MCB CAMPEN installations unless image and/or data collection is specifically authorized by the Installation Commander.

2. Recreational, Hobbyist or Model sUAS Operations. Commanders shall not authorize recreational, hobbyist or model sUAS operations aboard their installations or the associated Special Security Instruction (SSI) airspace.

a. Recreational, hobbyist, and model sUAS flyers are defined in references (g) and (h), as a person operating a sUAS strictly for hobby or recreational purposes in accordance with reference (i).

b. Recreational, hobbyist, and model sUAS flyers desiring to fly near an airport (outside SSI airspace) in controlled airspace should use the FAA's Low Altitude Authorization and Notification Capability (LAANC) or the FAA Drone Zone website (<https://faadronezone.faa.gov/>) to request airspace authorization in accordance with reference (h).

3. Title 14, Code of Federal Regulations (CFR) Part 91, Operations. Title 14 CFR Part 91 flight rules were originally created to regulate manned aircraft operations. However, Part 91 flight rules are also used by local, state, and/or federal agencies to fly Unmanned Aircraft Systems (UAS) as outlined in reference (e). All Department of the Navy (DON) public sUAS operations in United States Civil Airspace must be conducted in accordance with reference (j).

a. Since DoD sUAS are unable to comply with all aspects of Part 91, (such as instructions to "see and avoid" described in Part 91.113) an Alternate Means of Compliance (AMOC) must be authorized in a DON Airspace Access Authorization (AAA) (see chapter 3) or a FAA Certificate of Waiver or Authorization (COA).

b. Any deviations from Part 91 rules must be authorized in the DON AAA or the FAA COA.

4. Title 14, CFR Part 107, Operations. Title 14 CFR Part 107 flight rules may be used by private individuals, companies, and non-DoD government agencies or organizations operating a sUAS within U.S. Civil Airspace. In addition to the flight rules listed in reference (k), per reference (e), sUAS operations supporting DON activities shall comply with the following:

a. Individuals operating under Part 107 shall hold an FAA "Remote Pilot Certificate" with a sUAS rating or be under the direct supervision of a "Remote Pilot in Command".

b. DON personnel are not authorized to conduct public sUAS operations under Part 107 flight rules. However, under certain specific circumstances, sUAS operations supporting DON may be conducted as civil aircraft operations

under Part 107 if the activity is determined by Naval Air (NAVAIR) Systems Command, to be a civil sUAS operation.

c. 14 CFR Part 107 sUAS operations must be performed by contractors or other civil entities that are supporting or collaborating with organizations within the DON, and the unmanned aircraft must not be DON public aircraft.

5. Foreign sUAS Operations. Installation Commanders may approve allied and coalition partners to conduct sUAS operations above their respective installations provided the following conditions are met:

a. Foreign sUAS operations will be conducted only within Restricted Airspace.

b. The foreign proponent must possess a Commercial off-the Shelf (COTS) Exception to Policy (ETP) for the applicable sUAS.

c. If the foreign proponent does not possess a COTS ETP, at a hosting unit's discretion, they may fly a DoD sUAS provided they adhere to the instructions in this Order and the following stipulations:

(1) The foreign, allied or coalition sUAS operator must be under the direct oversight of a qualified and current DoD sUAS operator.

(2) The hosting DoD unit must maintain custody of the sUAS to ensure the security of the data obtained/stored during flight is not made available to the foreign military team.

(3) A DoD representative shall be dedicated to ensuring all foreign military sUAS flights do not stray from their intended paths or purpose.

(4) The foreign proponent/DoD sponsor must possess a DON AAA or FAA COA, as applicable.

(5) The foreign proponent must possess Department of State Diplomatic Clearance. Information regarding Diplomatic Clearance can be obtained at <https://www.state.gov/diplomatic-aircraft-clearance-procedures-for-foreign-state-aircraft-tooperate-in-united-states-national-airspace/>.

6. Operational Risk Management Assessments (ORM). Commanders shall conduct ORM assessments prior to providing flight authorization, with specific attention given to the safety of personnel, facilities, and operational security. The Installation Commander is authorized to revoke flight authorization for any operation deemed to be a risk to the security of the installation or to the safety of personnel assigned.

Chapter 3

Small Unmanned Aircraft Systems (sUAS) Requirements by Area of Operation

1. Area Requirements. Requirements for sUAS operations vary, depending on where the operation is to be conducted. Public and Civil sUAS Operations conducted above Department of Defense (DoD) property, in Restricted Airspace, and within the National Airspace System (NAS) all differ in terms of the approval process.

2. Operations Conducted in Restricted Airspace. Operations conducted within restricted airspace shall be executed in accordance with Installation Range Regulations and reference (1). Operations conducted entirely within active Restricted Airspace do not require a Federal Aviation Administration (FAA), Certificate of Waiver or Authorization (COA) nor a Department of the Navy (DON) Airspace Access Authorization (AAA). These operations are coordinated with the Installation Range Control and approved by the Installation Commander.

Note: Inactive Restricted Airspace is U.S. Civil Airspace and requires appropriate airspace access (i.e., COA or DON AAA).

3. Airspace Access. Unmanned Aircraft Systems (UAS) airspace access authorization is permission for a UAS to enter and operate within a particular volume of airspace that is granted by the agency with authority over that airspace. sUAS operators are responsible for knowing airspace requirements and must have the necessary airspace access approval prior to conducting sUAS operations.

a. Authorization to access and operate within U.S. Civil Airspace (outside of Restricted Airspace) by DON Public sUAS is governed by references (e) and (m). Proponents must obtain a DON AAA or FAA COA to conduct sUAS operations within U.S. Civil Airspace.

b. When operating near any airport, Public, Civil, and recreational sUAS operators should consult the applicable UAS Facility Map. UAS Facility Maps show the maximum altitude around airports where authorization may be given without an additional safety analysis by the airport using agency or FAA. Consulting UAS Facility Maps prior to submitting for airspace access assists in determining which locations and altitudes may be approved quickly. UAS Facility Maps can be accessed at:
<https://faa.maps.arcgis.com/apps/webappviewer/index.html?id=9c2e4406710048e19806ebf6a06754ad>.

Note: These maps do not authorize operations in these areas at the depicted altitudes - they are for informational purposes ONLY. Operators must still apply to operate in controlled airspace (Class B, D, or E).

c. DON AAA

(1) Required when a DON sUAS operation is conducted entirely within airspace delegated to the DON by the FAA.

(2) DON sUAS operations in Class G airspace require a DON AAA.

(3) DON AAAs are not required when the entirety of a sUAS operation will be conducted within Restricted Airspace. In this case, the installation Range Control must approve sUAS operations.

(4) In the case of Marine Corps Installations West-assigned U.S. Civil Airspace (outside of Restricted Airspace), DON AAA approval authority rests with the Deputy Commandant for Aviation, Aviation Expeditionary Enablers Branch Head (AXE-1).

d. In accordance with reference (m), an FAA COA is required for all DoD UAS operations conducted within FAA controlled U.S. Civil Class A, B, C, D, and E airspace.

e. If proponents are unsure of sUAS airspace access jurisdiction and requirements they should contact the Marine Corps Installations West-Marine Corps Base, Camp Pendleton (MCIWEST-MCB CAMPEN) Aviation Division.

4. COA/AAA Requests. If any portion of a sUAS flight will be conducted outside of Restricted Airspace, access shall be granted in either a FAA COA or DON AAA. The following includes requirements to apply for a COA/AAA:

a. Be designated in writing by a unit's Commanding Officer as a Department of the Navy Unmanned Aircraft System Airspace Access Applicant (see Appendix A). The unit Commanding Officer must be at least an O-5 or civilian equivalent. Airspace Access Applicant responsibilities are outlined in reference (e), section 1.3.2.

b. Copies of Airspace Access Applicant designations must be forwarded to the Regional sUAS Program Manager, MCIWEST-MCB CAMPEN Regional Aviation Office and the Navy Representative (NAVREP) to the FAA.

c. Airspace Access Applicants can request a FAA COA or DON AAA at <https://faadronezone-access.faa.gov/>.

5. Operations Conducted Above Marine Corps Installations West Property. Installation Commanders may authorize sUAS operations above their installations' property, provided the following conditions are met.

a. Proponents are requesting to operate a Program of Record (PoR) sUAS.

b. Proponents requesting to operate a Commercial off-the Shelf (COTS) UAS must possess DON airworthiness approval in the form of a flight clearance issued or promulgated by Commander, Naval Air Systems Command per reference (n).

c. Proponents must possess an approved DON COTS UAS Exception to Policy (ETP) for the model and configuration of the system to be operated. Step-by-step instructions for submitting ETP requests for the procurement or use of COTS UAS are available on the DON COTS UAS portal: <https://intelshare.intelink.gov/sites/doncotsuas>.

Note: A COTS ETP from another DoD agency is acceptable, provided the ETP has been granted by the Under Secretary for Acquisition and Sustainment and DoD Chief Information Officer or the Service-level authority when delegated.

d. Proponents have an operator training and certification program.

e. Proponents have the appropriate airspace access and have coordinated with Installation Air Traffic Control and/or Range Control prior to conducting operations.

f. The proponent is a DoD entity requesting to operate a non-PoR sUAS over MCIWEST-MCB CAMPENO property included on the Defense Innovation Unit (DIU) Blue UAS Cleared List. Per reference (m), the procurement and/or operation of any sUAS identified on the DIU Blue UAS Cleared List does not require a DoD ETP. The Blue UAS Cleared List can be found at <https://www.diu.mil/blue-uas-cleared-list>. Any modification to a Blue UAS or approved payload requires a DON COTS UAS ETP.

g. Civil proponents requesting to fly a sUAS on the Blue UAS Cleared List do not require a COTS ETP; however, the sUAS must be registered with DIU.

h. Non-PoR sUAS requests to fly indoors require a COTS ETP.

i. When not in Restricted Airspace, proponents must possess an approved DON AAA to fly within UAS-specific SSI airspace. Additional procedures for the management of Civil UAS operations in airspace above installation property designated by the FAA as Special Security Instruction (SSI) airspace can be found in Chapter 5 of this Order.

Chapter 4

Marine Corps Installations West-Marine Corps Base, Camp Pendleton (MCIWEST-MCB CAMPEN) Operated small Unmanned Aircraft Systems (sUAS) Program Policy

1. Purpose. To provide policy guidance to MCIWEST-MCB CAMPEN installations for the operation and management of Program of Record (PoR) and non-PoR Group 1 and 2 sUAS programs.

a. This policy applies to all Group 1 and 2 sUAS operations conducted by MCIWEST-MCB CAMPEN, and those operating the sUAS to include military, civilian, and contractor personnel.

b. MCIWEST-MCB CAMPEN sUAS programs shall be established and maintained in accordance with reference (1) and this Order.

c. Per reference (1), there are two essential command authorities for MCIWEST-MCB CAMPEN sUAS operations: the Designated Approval Authority (DAA) and the Aircraft Reporting Custodians (ARC).

(1) The DAA is the Flag Officer or Senior Executive Service equivalent who assumes Aircraft Controlling Custodian (ACC) authorities and responsibilities when an ACC is not designated.

(2) The ARC is the lowest echelon of command accepting responsibility for Group 1 and 2 UAS operations. The ARC is typically an O-5 level commander or above but may be a military officer or government civilian leading an organizational component as deemed appropriate by the DAA.

2. Roles and Responsibilities

a. Per reference (s), the DAA for MCIWEST-MCB CAMPEN sUAS operations is Commander, Marine Corps Installations Command (COMMCICOM). DAA responsibilities are delineated in reference (1).

b. Per reference (s), for MCIWEST-MCB CAMPEN installations operating Group 1 or 2 sUAS, the Installation Commander is designated as the ARC. ARC responsibilities are delineated in reference (1) and are executed by sUAS activity program managers.

c. The MCIWEST-MCB CAMPEN Regional Aviation Office shall manage the Regional sUAS Program. Their responsibilities include:

(1) Perform Responsible Officer-Custodian responsibilities of unmanned aircraft, control stations, and ancillary equipment as required.

(2) Collect and consolidate unit sUAS inventories and forward the total sUAS inventory to the DAA.

(3) Coordinate with Training and Logistics Support Activity (TALSA) for the obtainment of sUAS Operator, sUAS Program Manager, and sUAS Evaluator training seats.

(4) Conduct an annual Unit sUAS Inspection (USI) for each subordinate sUAS program per reference (q). Unit sUAS USIs shall be conducted in accordance with the sUAS program inspection checklist (see Appendix A of reference (r)).

d. Each unit sUAS activity conducting Group 1 and 2 sUAS operations, shall have a sUAS Program Manager. The program manager shall be designated in writing by the ARC. The sUAS Program Manager is accountable to the ARC for the administration of the activity's sUAS program. Unit sUAS Program Managers shall:

- (1) Attend the sUAS Program Managers Course provided by TALSA West.
- (2) Assume responsibility for overall administration of the activity's sUAS program.
- (3) Ensure that Individual Training Records (ITRs) are maintained for all sUAS operators within the activity. ITRs shall be maintained in accordance with reference (r); audits shall be conducted on an annual basis (at a minimum). Each ITR document shall be maintained for at least two years from the effective date of the document. ITR organization is outlined in Appendix B.
- (4) Ensure all sUAS operators meet proficiency and currency requirements outlined in reference (r) and are designated in writing by the appropriate ARC (see Appendix C). Recommend to the ARC suspension of designations for crewmembers who fail to meet currency or proficiency requirements.
- (5) Maintain an inventory of all sUAS owned by the activity. Inventories will be managed and maintained on the Small Unmanned Aircraft Systems Manager (SUASMAN) website, located at <https://suasman.sofapps.net/Site/Home>. Report inventories utilizing Appendix D to the MCIWEST-MCB CAMPEN Regional sUAS Program Manager, during the last week of each month.
- (6) Develop and route cyber Exception to Policy (ETP) requests for each type/model/series (T/M/S) of sUAS owned by the activity for which an ETP is required. Develop and route ETP requests in accordance with reference (t).
- (7) Obtain airworthiness certification (Interim Flight Clearance (IFC)) for each T/M/S of sUAS owned by the activity. Maintain documentation of airworthiness certification for each sUAS, as applicable.
- (8) Implement a safety program meeting the requirements of reference (v). The requirement for an Aviation Safety Officer has been waived per reference (q). sUAS programs shall fall under the unit's ground safety program and be administered by the command's designated Ground Safety Officer/Ground Safety Manager (must be a graduate of the Ground Safety for Marines and Ground Safety Mishap Investigator course).
- (9) Create and maintain Standing Operating Procedures (SOPs) for sUAS operations within the activity in accordance with reference (l).
- (10) Utilize SUASMAN to log and track all unit sUAS training. Submit a Monthly Training and Operations Report to the ARC, using the template provided in Appendix E. This report shall be submitted to the ARC no later than the 5th working day of each month, accounting for the previous month's operation.

(11) Prior to the conduct of sUAS operations, ensure sUAS operator proficiency and currency per reference (r). All sUAS flights must be logged in each sUAS operator's ITR and on the SUASMAN website.

(12) Ensure recertifications of sUAS operator currency events are conducted by a sUAS Evaluator (sUAS-E), per reference (r). sUAS-Es may be trained at TALSA West. Only TALSA Initial Qualification Training Instructors or Adjunct Faculty may conduct initial certification of sUAS operators or recertification of sUAS operators who have a lapse in currency greater than 730 days.

(13) Ensure appropriate lithium battery storage is conducted in accordance with reference (l).

(14) Coordinate with the Regional sUAS Program Manager for the obtainment of Program Manager, sUAS-E, and sUAS operator introductory training seats.

(15) Coordinate with the Regional sUAS Program Manager prior to checking-out sUASs from TALSA.

e. MCIWEST-MCB CAMPEN sUAS operators shall:

(1) Adhere to the applicable portions of reference (l).

(2) Meet the Basic Unmanned Aircraft System Qualification (BUQ) level I and II training requirements, per reference (l).

(3) Satisfy the medical qualification requirements of references (l) and (u). Utilize reference (o) to conduct medical pre-screening prior to initial sUAS operator training.

(4) Meet the minimum Group 1 and 2 sUAS crew training and qualification requirements prior to conducting operations within class B, D, E, or G airspace or special use airspace. Utilize Appendix G to verify prerequisite training accomplishment prior to initial sUAS operator training.

(5) Maintain currency in accordance with reference (r).

(6) Comply with applicable Federal Aviation Regulations.

(7) Continually assess and mitigate potential risk during sUAS operations in accordance with reference (w).

(8) Maintain an individual flight log for all flights conducted (live or simulated), utilizing the template provided in Appendix H. Individual flight logs shall be retained in the ITR.

3. Non-PoR sUAS Procurement. Units within MCIWEST-MCB CAMPEN are authorized to procure and operate non-PoR Commercial off-the Shelf (COTS) Unmanned Aircraft Systems (UASs) provided they are acquired in accordance with reference (n), satisfy the requirements set forth in references (t) and (x), and have been approved for a COTS ETP.

4. General sUAS Operator Rules. sUAS operations shall be executed in accordance with the provisions contained within the applicable DON AAA, FAA COA, or local policy (e.g., range regulations).

5. Training Requirements for sUAS Operator Designation. Training requirements contained in references (l) and (r) are the minimum requirement for sUAS Operator Designation. ARCs shall also establish local UAS crew training and qualification requirements that are tailored to the T/M/S operated, missions supported, local airspace, and environment where operations will be conducted.

6. Incidents, Hazards, and Aviation Mishaps. Unit Commanding Officers are responsible for establishing a safety program and complying with applicable safety policies, provisions, and mishap reporting requirements provided in references (m) and (v).

a. In addition to reporting requirements outlined in references (m), (q), and (v), all unsafe or abnormal events, incidents, hazards, and aviation mishaps shall be reported to the Regional sUAS Program Manager utilizing Appendix I, within 24 hours.

(1) Following notification of a reported incident, hazard, or aviation mishap, the Regional sUAS Program Manager will notify the MCIWEST-MCB CAMPEN Aviation Safety Office and TALSA West of the incident, hazard, or aviation mishap.

(2) The Regional sUAS Program Manager must report to the Navy Representative (NAVREP) and the DON FAA Headquarters Liaison any unsafe or abnormal events, incidents, hazards, and aviation mishaps that occur outside of Department of Defense (DoD) property or in U.S. Civil Airspace, in accordance with reference (e).

b. Definitions

(1) Unsafe or abnormal event. Reference (e) describes an unsafe or abnormal event. These events include but are not limited to:

(a) A malfunction or failure affecting the UAS flight controls, navigation, propulsion, takeoff/landing, or collision avoidance systems.

(b) An emergency is declared or experienced.

(c) A deviation from an air traffic control (ATC) instruction or any provision contained within a DON AAA, COA, ATC letter of agreement, or ATC standard operating procedure.

(2) Incidents. Reference (v) and the Naval Safety Command define an incident as "the loss or impairment of effectiveness or utility of an item that has occurred solely because of normal and customary use of the item for its intended purpose" with total damage costs of less than \$25,000.

(3) Hazards. Reference (v) and the Naval Safety Command define a hazard as, "any real or potential condition that can cause injury, illness, or death to personnel; damage to or loss of a system, equipment or property; or damage to the environment." An example is a near mid-air, an undesired event that under slightly different circumstances would have resulted in personal harm, property damage, or undesired loss of resources.

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(4) Aviation Mishap. Reference (v) and the Naval Safety Command provide the methodology for determining reporting thresholds and reporting categories. The current minimum threshold for reporting a mishap occurs when the total cost of damage to DoD or non-DoD property or aircraft is \$25,000 or more; or a recordable injury (greater than first aid) or illness occurs.

Chapter 5

Special Security Instruction (SSI) Airspace

1. Purpose. To provide policy guidance for installations with designated SSI airspace for establishing, managing, and approving access into SSI airspace.
2. Scope. This policy applies to all Marine Corps Installations West-Marine Corps Base, Camp Pendleton (MCIWEST-MCB CAMPEN) installations for which SSI airspace is assigned.
3. Background. Unmanned Aircraft Systems (UAS)-specific SSI airspace, created in 2017, is a protective measure codified in reference (y) and coordinated between the Federal Aviation Administration (FAA) and Department of Defense (DoD), as described in references (y) and (z). These documents provide the DoD with the legal authority to regulate UAS operations in the airspace above DoD property, consistent with national security interests. Airspace within the lateral boundaries of MCIWEST-MCB CAMPEN property, up to 400 feet above ground level, is SSI airspace. UAS operations are prohibited aboard MCIWEST-MCB CAMPEN installations and associated SSI airspace, unless approved by the Installation Commander. SSI airspace can be viewed at the following website:
<https://faa.maps.arcgis.com/apps/webappviewer/index.html?id=9c2e4406710048e19806ebf6a06754ad>.
4. Roles and Responsibilities
 - a. The Commanding General (CG), MCIWEST-MCB CAMPEN will submit a biannual log, per references (y) and (z) for MCIWEST-MCB CAMPEN installations.
 - b. Installation Commanders shall:
 - (1) Designate Installation SSI Airspace Managers to ensure installations comply with the policies outlined in this Order, and in references (y) and (z).
 - (2) Establish local procedures for processing requests to operate UAS within the installation's SSI airspace, per references (y) and (z).
 - (3) Approve or deny requests, as appropriate, to operate UAS within the installation's SSI airspace.
 - (4) Submit requests for establishing or modifying SSI airspace to the FAA, via the chain of command.
 - (5) Submit data required for biannual reports as outlined in reference (z) to the CG MCIWEST-MCB CAMPEN; attention G3/5, Aviation Division no later than 15 January and 15 July.
 - c. Installation SSI Airspace Managers shall:
 - (1) Serve as the installation's primary point of contact (POC) for SSI airspace matters, to include requests for access to the same. Ensure a POC is identified to facilitate after hours, emergent requests for access into SSI airspace.

(2) Document and maintain the information required, per references (y) and (z), to support biannual reporting requirements. Submit this information to the CG MCIWEST-MCB CAMPEN; attention G-3/5, Aviation Division (via the Installation Commander), and be prepared to provide this information in response to FAA inquiries and unscheduled requests for information.

(3) Prior to allowing UAS entry into SSI airspace, notify the Installation Commander, the Command Duty Officer (CDO), the Provost Marshal's Office (PMO), and airfield operations (if applicable) of approved UAS operations within the installation's SSI airspace to ensure proper coordination and safety. Although emergent situations do not require prior approval, notification to the Commanding Officer, CDO, PMO, and airfield operations (if applicable) shall be made as soon as possible.

5. Biannual Log. Any requests for UAS entry into SSI airspace shall be documented and submitted to the FAA. Per reference (z), the following information shall be collected for each request and maintained by the SSI airspace manager:

- a. Subject UAS-specific SSI airspace.
- b. Subject branch, base and facility, and corresponding county and state.
- c. Date of requested UAS operation.
- d. Area of requested UAS operation.
- e. Reason for approval or denial.
- f. Identification and contact information of requesting UAS operator.
- g. Statistical totals of the information above, specifying total number of approvals and denials, by date and location.

6. UAS Operations within SSI Airspace. The approval process for the conduct of UAS operations within SSI airspace is managed by the installation SSI Airspace Manager and shall be processed in accordance with references (y) and (z). Appropriate documentation, to include Interim Flight Clearance (IFC), commercial off-the shelf (COTS), UAS Exception to Policy (ETP), and service component waivers shall be completed and approved as necessary, prior to Installation Commander approval.

- a. Operations anticipated to qualify for approval include:
 - (1) Operations that include a compelling security reason.
 - (2) Operations that include a compelling safety reason.
 - (3) Operations on the basis of legal right or necessity (e.g., easement or right-of-way).
 - (4) Operations that are part of some other activity normally permitted by the Installation Commander within the protected area, such as recreational, promotional, or commemorative events.

b. Operations that do not require prior approval of the Installation Commander:

(1) UAS flight operations conducted in direct support of an active national defense, homeland security, law enforcement, firefighting, search and rescue, or disaster-response missions. (Note: In such cases, prior notification will be provided to the installation SSI Airspace Manager.)

(2) UAS flight operations conducted in direct support of a significant and urgent governmental interest and approved by the FAA System Operations Support Center (SOSC) in advance of entering the defined SSI airspace, are exempt from SSI airspace restrictions. (Note: In such cases, the agency operating the UAS will coordinate with the FAA and the installation SSI Airspace Manager prior to the UAS entering the installation's SSI airspace.)

(3) When applicable, sUAS Operations that do not require prior approval from the Installation Commander still require air traffic control and range control operations deconfliction.

APPENDIX A

Airspace Access Applicant Designation Template



UNITED STATES MARINE CORPS
ORGANIZATION/ACTIVITY
BOX 00000
MARINE CORPS BASE/AIR STATION 00000-0000

3700
Office Code
DD Mon YY

From: Commanding Officer, *Unit Name*
To: Rank First MI. Last Name EDIPI/MOS USMC -or- Mr. Im A. Civilian, GS-
0000-Grade

Subj: DEPARTMENT OF THE NAVY UNMANNED AIRCRAFT SYSTEM AIRSPACE ACCESS
APPLICANT DESIGNATION

Ref: (a) Requirements and Guidance for Access to and Operations within
United States Civil Airspace by Department of the Navy Unmanned
Aircraft Systems

1. Per reference (a), you are hereby designated as Unmanned Aircraft System (UAS) Airspace Access Applicant for [UNIT].
2. You shall understand and comply with all policies and procedures set forth in the reference that pertain to the role and responsibilities of a UAS Airspace Access Applicant.
3. This designation will remain in effect until you are properly relieved, upon your transfer from this command, or until rescinded by proper authority.

I. M. COMMANDING

Copy to:

APPENDIX B

Individual Training Record Organization

- I. General.
 - A. Privacy Act Statement
 - B. Record of Audit
 - C. Medical Documentation
- II. Designation Letters
- III. Training and Course Completion Certificates
- IV. Flight Log
- V. sUAS Event Training Forms (ETFs)
- VI. sUAS Flight Evaluations Maintaining

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APPENDIX C

sUAS Operator Designation Letter Template



UNITED STATES MARINE CORPS
ORGANIZATION/ACTIVITY
PSC BOX 00000
MARINE CORPS BASE/AIR STATION 00000-0000

SSIC
Office Code
DD Mon YY

From: Commanding Officer, *Installation Name*
To: Lance Corporal First Name MI. Last Name EDIPI/MOS USMC -or-
Mr. Im A. Civilian, GS-0856-Grade

Subj: DESIGNATION AS A *SMALL UNMANNED AIRCRAFT SYSTEM OPERATOR*

Ref: (a) NAVMC 3500.107
(b) CNAF 3710.9
(c) Local sUAS SOP

1. With satisfactory completion of the Small Unmanned Aircraft System (sUAS) operator training and qualification requirements outlined in the references, you have demonstrated the knowledge and skill expected of a sUAS operator within [Organization/Activity].
2. In accordance with the references, I hereby certify you are qualified to operate a sUAS aboard [installation].
3. In the performance of your duties, and during the conduct of flight operations and associated activities, you will be guided by the references and specific directions provided by your organization's sUAS Program Manager.
4. While this designation certainly represents a professional milestone, it does not constitute an end to your learning and training. I expect you to continually strive to maximize your proficiency in this arena.

I. M. ARC

Copy to:

APPENDIX F

sUAS Training Prescreening Letter



UNITED STATES MARINE CORPS
MARINE CORPS INSTALLATIONS WEST-MARINE CORPS BASE
BOX 555010
CAMP PENDLETON, CA 92055-5010

IN REPLY REFER TO:
3700
G3/5 AVND

1. Purpose: To ensure accomplishment of prerequisites for Marines selected to train as Small Unmanned Aircraft System (sUAS) crewmembers.
2. Action: This completed checklist will be submitted to the sUAS Program Manager, provided to Training and Logistics Support Activity West trainers upon check-in, and kept in the sUAS crewmember's Individual Training Record.

NAME: _____ GRADE: _____ EDIPI: _____

UNIT: _____

SYSTEM:

- Fixed Wing: PUMA
- VTOL: INSTANTEYE
- COURSE START DATE: _____ END DATE: _____

PREREQUISITES: YES / NO

1. Time left on station greater than 6 months _____
2. Full Duty Status. (Medical Officer / Corpsman) _____
 - a. Vision able to be corrected to 20/20 in each eye.
 - b. Able to pass a color vision test. (Not color blind)
 - c. Able to pass a depth perception test.
3. Completed all BUQ-1 courses on SUASMAN <https://suasman.sofaps.net> _____

** I understand that failure to report at the required time, can result in dismissal from the course, and a loss of a course seat for the unit.

Student Print

Signature

Date

SUAS Program Manager

Signature

Date

APPENDIX G

sUAS Operator Flight Log Template

FLIGHT LOG

Name:

EDIPI:

Date	Location	Channel	Wx	VO	MO	Launch	Land	Time
RMKS:							AV#	
Date	Location	Channel	Wx	VO	MO	Launch	Land	Time
RMKS:							AV#	
Date	Location	Channel	Wx	VO	MO	Launch	Land	Time
RMKS:							AV#	
Date	Location	Channel	Wx	VO	MO	Launch	Land	Time
RMKS:							AV#	
Date	Location	Channel	Wx	VO	MO	Launch	Land	Time
RMKS:							AV#	
Date	Location	Channel	Wx	VO	MO	Launch	Land	Time
RMKS:							AV#	
Date	Location	Channel	Wx	VO	MO	Launch	Land	Time
RMKS:							AV#	
Date	Location	Channel	Wx	VO	MO	Launch	Land	Time
RMKS:							AV#	