



Surveillance Use Policy

Counter UAS Remote Identification Detection Equipment, CUAS-RID San Diego Police Department

PURPOSE

Unmanned Aircraft Systems (UAS) commonly referred to as “drones” when used illegally or carelessly, pose a threat to the safety and security of the citizens of San Diego and First Responders. They obstruct the ability for First Responders to properly address life, safety and protection needs such as inhibiting fire response and intelligence gathering during high-risk tactical operations.

The implementation and use of Counter UAS Remote Identification equipment is to enhance the safety and security in the airspace and on the ground for first responder operations and for the general public by enhanced detection of the FAA mandated UAS data broadcast requirement known as Remote Identification or RID.

USE

The San Diego Police Department (SDPD) CUAS-RID equipment is authorized to support the following types of operations:

1. Any first responder incident where air assets (helicopter or UAS) are present.
2. Any fire incident that may potentially require air asset support.
3. Any incident where an unidentified UAS is obstructing or interfering with first responder operation or reasonably believed to have the potential to cause interference or obstruction.
4. Any large mass gathering or special event that may pose a vulnerability for UAS borne attack or UAS safety hazard area.
5. Any Law Enforcement tactical operation that may have a vulnerability to officer or citizen safety derived from UAS counter-intelligence gathering.
6. Any special detail enforcement project that has a nexus to UAS use of criminal activity, terrorist activity, or casing to commit criminal activity.
7. Training operations.
8. Any other use case approved by the CUAS-RID Lieutenant. This duty commonly falls under the Air Support Lieutenant.

The following rules and processes are required prior to each use of a CUAS-RID:

For Mobile CUAS-RID:

1. Requests for CUAS-RID support will be made by a supervisor.
2. Requests for CUAS-RID support for both planned and unplanned events should be forwarded to a CUAS-RID program approved sergeant for use approval and coordination of response.
3. The CUAS-RID sergeant will direct CUAS-RID equipped officers to deploy and activate CUAS-RID equipment as needed to the requested incident or event.
4. Only authorized CUAS-RID program personnel shall use or be in possession of Department issued CUAS-RID detection equipment, unless approved by a CUAS-RID program sergeant.
Note: Members of the San Diego Fire Department may be included in the CUAS-RID program and authorized to carry and deploy CUAS-RID detection equipment to facilitate better access and faster detection capability during critical fire incidents.



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5. CUAS-RID equipped officers will deploy to the vicinity of the scene as directed and activate their detection equipment. They will remain in the area until directed to relocate or deactivate equipment by the CUAS-RID supervisor.
6. Only authorized CUAS-RID program personnel shall have access to or be in possession of the department's CUAS-RID user interface (UI). The officer accessing the CUAS-RID UI will relay information to the incident commander (IC) and CUAS-RID supervisor as needed to support the overall incident.

Department Procedures associated with the use of UASs are:

- XXX – Use of Counter UAS Remote Identification Detection Equipment
- 8.23 – Use of Small Unmanned Aircraft System
- 3.02 – Impound, Release, and Disposal of Property, Evidence and Articles Missing Identification marks
- 1.49 – AXON Body Worn Cameras.

BACKGROUND OF FAA REMOTE ID REQUIREMENT

Effective September 16, 2023, the Federal Aviation Administration implemented the Remote Identification (RID) requirement for UAS under Code of Federal Regulations (CFR) Title 14, Part 89, that mandates UAS broadcast via radio signal details about the aircraft, its position and the control station position.

The FAA developed this program to enhance safety and security, airspace deconfliction, and to allow the FAA, Law Enforcement, and other Federal Agencies to locate the control station when a drone appears to be flying in an unsafe manner or where it is not allowed to fly.

Under 14 CFR Part 89.305, the minimum message elements that a standard UAS RID must electronically broadcast are:

- The identity of the UAS, consisting of:
 - A serial number assigned to the unmanned aircraft by the person responsible for the production of the standard remote identification unmanned aircraft; or
 - A session ID.
- An indication of the latitude and longitude of the control station.
- An indication of the geometric altitude of the control station.
- An indication of the latitude and longitude of the unmanned aircraft.
- An indication of the geometric altitude of the unmanned aircraft.
- An indication of the velocity of the unmanned aircraft.
- A time mark identifying the coordinated universal time (UTC) time of applicability of a position source output.
- An indication of the emergency status of the unmanned aircraft.



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DESCRIPTION OF EQUIPMENT

Hardware devices consisting of a radio signal receiver that is able to detect the RID broadcast from UAS from several miles away will display this broadcasted data onto a user interface for assessment. These devices are predominantly portable devices but may be installed semi-permanently.

The devices use antennas to receive the UAS RID radio signal. The device then sends the data via cellular network back to the manufacturers cloud-based system. The data can then be viewed via access to the cloud's user interface, commonly a website. The user interface requires password protected access credentials.

The data collected by Department CUAS RID devices is partitioned or separated from display or access by non-department entities within the manufacturers cloud-based data management system.

For this Use Policy, SDPD is only seeking approval to procure, deploy, and utilize the CUAS equipment components that detect the FAA's mandated RID broadcast and no other sensors.

DATA COLLECTION

The CUAS-RID equipment collects the FAA mandated RID broadcast signal and displays the UAS broadcasted data onto the user interface (UI). All data received by the CUAS-RID and managed on the UI is not considered evidence and is not automatically stored nor retained as evidence, unless it has evidentiary value for a criminal case and identified as Digital Media Evidence (DME).

CUAS-RID equipment only collects data on the UAS equipment that is self-broadcasting. It does not collect any personal information on any person or operator. It does not collect any personal identifying information (PII). It does not collect any photographs or video of the UAS in flight.

DATA ACCESS

San Diego Police Department Procedure **X.XX** states in part:

“Only authorized CUAS-RID program personnel shall have access to or be in possession of the department's CUAS-RID User Interface (UI).”

Access to the CUAS-UAS UI will require password credential and specific user access to allow for auditing of user access.



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DATA PROTECTION

The data collected by Department CUAS-RID devices is partitioned or separated from display or access by non-department entities within the manufacturers cloud-based data management system.

The collection and retention of data managed on the UI that is identified as Digital Media Evidence (DME) will be limited to the extent necessary to support an investigation, enforcement actions, or evaluation for potential criminal and terrorist activity. Data that is identified as DME will be stored and retained in accordance with Department procedure 3.02 (Impound, Release, and Disposal of Property, Evidence, and Articles Missing Identification Marks).

DATA RETENTION

Once DME has been impounded physically or electronically, evidence retention is the responsibility of the SDPD Property Unit and all such evidence is controlled and regulated by SDPD Procedure 3.02 – Impound, Release, and Disposal of Property, Evidence and Articles Missing Identification marks and SDPD Procedure 1.49 – AXON Body Worn Cameras.

Retention timeframes depend on the nature of the incident and any related investigative or prosecutorial requirements, and in accordance with state law.

PUBLIC ACCESS

CUAS-RID collected DME can only be accessed by SDPD UAS Unit personnel prior to evidence impound. Once CUAS-RID collected DME is impounded by Department personnel into the SDPD Property Room or evidence.com digital repository, access to this DME is controlled and regulated by SDPD Procedure 3.02 – Impound, Release, and Disposal of Property, Evidence and Articles Missing Identification marks and SDPD Procedure 1.49 – AXON Body Worn Cameras.

THIRD PARTY DATA SHARING

Department personnel shall not share CUAS-RID collected DME with third-party vendors. All CUAS-RID collected DME is impounded either physically in the SDPD Property Room or digitally into evidence.com. The UAS unit only shares collected DME with the San Diego City Attorney or the San Diego District Attorney in connection with legal proceedings, in response to a valid court or judicial order or in accordance with federal or state law.

TRAINING

Only SDPD and SDFD trained CUAS-RID operators are authorized to use any of the Department CUAS-RID Equipment and CUAS-RID User Interface. The CUAS-RID Sergeant is responsible for all aspects of CUAS-RID training and certification. The CUAS-RID Sergeant will maintain a list of certified instructors and operators.



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AUDITING AND OVERSIGHT

The CUAS-RID supervisor is the primary oversight and approver of each CUAS-RID Operation. This supervisor is responsible to ensure all actions by CUAS-RID personnel comply with SDPD Department Procedures and the Surveillance Use Policy for each specific CUAS-RID operation. The CUAS-RID Sergeant is also responsible for the selection of officers that are included in the CUAS program.

The CUAS-RID sergeant and lieutenant are the primary oversight for the entire CUAS-RID Program. The CUAS-RID sergeant conducts monthly inspections and audits of all UAS Operations and activity and generates an annual report on the operational use of CUAS-RID equipment by the SDPD.

Once UAS collected DME is impounded by UAS personnel into the SDPD Property Room or evidence.com digital repository, access to this DME is controlled and regulated by SDPD Procedure 3.02 – Impound, Release, and Disposal of Property, Evidence and Articles Missing Identification marks and SDPD Procedure 1.49 – AXON Body Worn Cameras.

MAINTENANCE

CUAS-RID equipment requires little to no maintenance as there are no moving parts. If a device becomes inoperable, it will be returned to the manufacturer for repair.