

NOTICE

U.S. DEPARTMENT OF TRANSPORTATION FEDERAL AVIATION ADMINISTRATION

N 8900.741

National Policy

Effective Date:
6/9/25

Cancellation Date:
6/9/26

SUBJ: Title 14 CFR Part 137 Unmanned Aircraft Systems (UAS) Certification

1. Purpose of This Notice. This notice provides guidance to Federal Aviation Administration (FAA) Flight Standards (FS) Safety Assurance offices concerning the changes to the certification process of Title 14 of the Code of Federal Regulations (14 CFR) part 137 UAS. The FAA has determined that 14 CFR part 137 UAS agricultural aircraft operations present a lower risk than other certificated operations and revising the 14 CFR part 137 certification process would not adversely affect safety. It is the intent of this notice to outline the changes to the certification process for UAS in agricultural aircraft operations. This notice will help ensure uniform application of policy through guidance.

2. Audience. The primary audience for this notice is the FS Safety Assurance offices' aviation safety inspectors (ASI) and principal inspectors (PI). The secondary audience includes FS ASIs' Front Line Managers (FLM), office managers, and division managers.

3. Where You Can Find This Notice. You can find this notice on the MyFAA employee website at https://employees.faa.gov/tools_resources/orders_notices and the Dynamic Regulatory System (DRS) at <https://drs.faa.gov>. Operators and the public can find this notice on the FAA's website at https://www.faa.gov/regulations_policies/orders_notices and DRS.

4. Cancellation. This notice cancels Notice N 8900.704, Part 137 Unmanned Aircraft Systems (UAS) Certification, dated June 10, 2024.

5. Background. The FAA has seen a significant increase in agricultural aircraft operator certificate applicants seeking to use UAS in agricultural aircraft operations under 14 CFR part 137 and has approved hundreds of these requests with few incidents. Therefore, the FAA is shifting to a risk-based approach to streamline the certification process for these lower-risk operators. These include the following changes: (1) the 14 CFR part 137 certification process; (2) revising the documentation requirements; (3) approved aircraft; and (4) other changes to align with FAA policy.

6. Policy.

a. Title 14 CFR Part 137 UAS Certification Process. Historically, an applicant requesting a 14 CFR part 137 operator certificate utilizing UAS would submit a Letter of Intent and FAA Form 8710-3, Agricultural Aircraft Operator Certificate Application, to the responsible Flight

Standards District Office (FSDO) in order to be placed on the Certification Services Oversight Process (CSOP) National Applicant List where they would await the initiation of the certification process. In addition, an applicant utilizing UAS without a type certificate (TC) would also have to petition for and be granted an exemption for relief to certain sections of the regulations pertaining to the proposed operation prior to becoming a certified 14 CFR part 137 operator.

(1) This notice streamlines the 14 CFR part 137 UAS certification process by removing the requirement for the applicant to submit documents to the responsible FSDO. While some requirements have been removed from the certification process, the operator must still petition for an exemption from the applicable regulations that pertain to the requested operation and intended UAS used in the operations. This policy change only requires the applicant to submit FAA Form 8710-3 and the operator's issued exemption number to the Safety Assurance Branch (AFS-760) at UAS137Certificates@faa.gov.

(2) Because the FAA has determined unmanned aircraft (UA) agricultural operations are lower risk than manned aircraft in a similar operation, the 14 CFR § 137.19(e) knowledge and skill tests required in the certification process may now be self-administered. Satisfactory completion of the test of knowledge specified in 14 CFR § 137.19(e)(1) and the test of skill specified in 14 CFR § 137.19(e)(2) must be documented and shown to the FAA upon request. Demonstration of the 14 CFR § 137.19(e) knowledge and skill tests by the applicant or their designated chief supervisor does not alleviate the pilot-in-command (PIC) requirements of 14 CFR § 137.41(c).

(3) No Letters of Authorization (LOA) will be issued in the Operations Safety System (OPSS). AFS-760 will list the operator in the Safety Assurance System (SAS) only; therefore, the responsible FSDO will not be required to list the operator in SAS or OPSS. An Operating Certificate will be issued by AFS-760. In such case where the operator already holds an Operating Certificate for 14 CFR part 137 agricultural operations, the addition of UAS will not require any amendments to the operator's existing authorizations.

(4) Administratively, AFS-760 will be considered the responsible Flight Standards office for newly certificated 14 CFR part 137 certificate holders (CH) that only utilize UA. For 14 CFR part 137 CHs that utilize a mix of manned aircraft and UA, or for those 14 CFR part 137 CHs that utilize only manned aircraft, the responsible FSDO will be the responsible Flight Standards office. However, AFS-760 does not have adequate resources positioned geographically throughout the United States and its territories, and will rely on the assistance of the responsible FSDOs to conduct field activities to include inspections, demonstrations, surveillance, and investigations of events such as accidents, incidents, occurrences, pilot deviations, and complaints. AFS-760 will coordinate with the responsible FSDO for assistance with geographic field activities.

(5) FAA Order 1800.56, National Flight Standards Work Program Guidelines (NPG), requires responsible Flight Standards offices to conduct annual surveillance of at least 20 percent of certificated 14 CFR part 137 operators in their office. Since the FAA has determined UA agricultural operations are lower risk than manned aircraft in similar operations, the annual surveillance per Order 1800.56 for 14 CFR part 137 CHs that only utilize UA is not required. For 14 CFR part 137 CHs that utilize a mix of manned aircraft and UA, or for those 14 CFR part 137

CHs that utilize only manned aircraft, the annual surveillance per Order 1800.56 is still required. If AFS-760 determines surveillance of a 14 CFR part 137 CH that only utilizes UA is necessary, the office will coordinate the surveillance needs with the responsible FSDO.

b. Document Requirements. Although 14 CFR part 137 does not require an operations manual or training program, this policy change requires both for 14 CFR part 137 UAS operators.¹ The requirement mitigates safety concerns related to crew training and the streamlined UAS certification process now being implemented, as well as proper handling and stowage of hazardous materials (hazmat) and economic poisons.

(1) The policy requires that the operations manual, at a minimum, must address the following topics: Safety Risk Management (SRM), adverse weather, flight planning, Notice to Airmen (NOTAM), aircraft inspection, preflight duties, postflight duties, normal and emergency flight procedures, Crew Resource Management (CRM) and communications, crewmember responsibilities, accident reporting, hazmat handling and stowage, and UAS maintenance. Additionally, as part of the FAA's continuous operational safety oversight, the operator must provide a copy of this manual to the FAA upon request.

(2) The policy also requires that the training program, at a minimum, must address the following topics: the knowledge requirements of 14 CFR § 137.19(e)(1), initial training, recurrent training, testing, completion standards, ground training, site surveying, flight training, emergency procedures, lost-link procedures, the operator's exemption, the Air Traffic Organization (ATO)-issued Certificate of Waiver or Authorization (COA) (if applicable), and hazmat handling and stowage. Additionally, as part of the FAA's continuous operational safety oversight, the operator must provide a copy of this manual to the FAA upon request. All crewmembers must satisfactorily complete training in accordance with the operator's training program. Satisfactory completion of training must be documented, and the documentation must be provided to the FAA upon request. Furthermore, the operator may conduct training operations only for the operator's employees.

(3) The FAA has determined a sufficient level of safety can be maintained without submitting these manuals to the FAA for review, so long as the operator's operations manual and training program meet the criteria as previously described. Furthermore, the operator is required to be in possession of all operating documents during operations.

c. Approved Aircraft. The operator is approved to use all previously approved aircraft under Title 49 of the United States Code (49 U.S.C.) § 44807. The operator is also authorized to operate any UAS weighing less than 55 pounds (lbs), including payload with a valid corresponding exemption.

d. Alignment of Policy. The statutory requirement for an airman certificate is codified in 49 U.S.C. § 44711(a)(2). Pilots who conduct operations using a Remote Pilot Certificate would

¹ Title 14 CFR part 137 UAS operators that were certificated and hold an Operating Certificate prior to June 13, 2023, are not required to have the manuals listed in this notice. Manual requirements will be listed on future grants of exemption for these operators.

comply with 49 U.S.C. § 44711(a)(2), as described in the Operation and Certification of Small Unmanned Aircraft Systems final rule (81 FR 42064).

(1) The FAA will require pilots who act as PIC for 14 CFR part 137 CHs that only utilize UA to hold at least a Remote Pilot Certificate, and they are not required to hold a Commercial Pilot Certificate. The FAA bases its decision on the specific requirements imposed by the Remote Pilot Certificate, operator-specific training, controlled-access locations, speed limitations, and extremely low-altitude operating environment.

(2) Manned agricultural operations under 14 CFR part 137 typically would require a second-class airman medical certificate issued under 14 CFR part 67. Due to the nature of the proposed operations, the FAA has determined that allowing a pilot to conduct agricultural UA operations that are autonomously controlled by the UAS without a medical certificate would not adversely affect safety. However, the FAA will still require the PIC to hold a third-class medical certificate for all night operations if the UAS is not operated in an autonomous mode because a PIC's manual control of the UA would subject operations to the risk of a subtle or sudden incapacitation.

7. Procedures for New Applicant.

a. Certification Process. Applicants will petition for exemption via <https://www.regulations.gov> in accordance with 14 CFR part 11. Applicants will then email AFS-760 with the exemption number once they receive a grant of exemption. Applicants should wait until the exemption is issued before contacting AFS-760.

b. Issuance. Applicants will then email AFS-760 at UAS137Certificates@faa.gov with the exemption number that was granted to them along with their completed FAA Form 8710-3. AFS-760 will then enter the required information in SAS and issue the Operating Certificate.

Note: As of June 13, 2023, the FSDO no longer accepts any Letters of Intent or FAA Forms 8710-3, nor adds any applicants in CSOP for 14 CFR part 137 UAS operators. If necessary, the FSDO will provide the information from this notice to applicants unaware of this policy change.

8. Action: Existing 14 CFR Part 137 Operators Adding UAS and Requests to Equip a Potentially Dangerous Weapon.

a. FSDOs that receive requests from certificated 14 CFR part 137 operators who want to add UAS to their existing operations will handle those requests. To align with the policy change, ASIs will need to verify the operator has been issued an exemption, modify the existing operator profile in SAS to reflect the proposed changes, and file the documentation in the operator's file accordingly. No amendments to existing authorizations will be required.

b. ASIs will not be required to conduct the knowledge and skill tests for the UAS chief supervisor. To align with current policy, the operator's chief supervisor's knowledge and skill tests of 14 CFR § 137.19(e) may be self-administered. Documentation of satisfactory completion of both the training program and the knowledge and skill tests of 14 CFR § 137.19(e) must

include the date of the test as well as the PIC's name, FAA pilot certificate number, and legal signature. This documentation must be provided to the FAA upon request.

c. With the cancellation of Notice N 8900.656, LOA A130, Authorization to Operate an Unmanned Aircraft System Equipped with an Aerial Ignition System Under 14 CFR Part 137, FSDOs and AFS-760 will no longer be issuing A130 in OPSS for any requests from an UAS 14 CFR part 137 operator. All requests and questions in regard to UAS equipped with an aerial ignition system under 14 CFR part 137 are to be forwarded to the General Aviation and Commercial Branch (AFS-750) at 9-AVS-FS-AFS-700-Correspondence@faa.gov. If a 14 CFR part 137 operator is issued an authorization from the Emerging Technologies Division (AFS-700), the operator will notify the FSDO and provide a copy to upload to "Document Management" in the SAS Menu.

9. Updates. Within the next 12 months, the following documents will be updated:

- FAA Order 8900.1, Volume 2, Chapter 8, Section 1, The Certification Process of a 14 CFR Part 137 Operator;
- FAA Order 8900.1, Volume 5, Chapter 8, Section 1, Issuance of a Medical Certificate and/or a Statement of Demonstrated Ability, or Letter of Evidence; and
- Advisory Circular (AC) 137-1, Certification Process for Agricultural Aircraft Operators.

10. Disposition. We will incorporate the information in this notice into Order 8900.1 before this notice expires. Direct questions or comments concerning the information in this notice to AFS-700 at 202-267-9700 or 9-AVS-FS-AFS-700-Correspondence@faa.gov.



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