



**U.S. Customs and
Border Protection**

NOV 02 2007

Douglas Davis
Manager, Unmanned Aircraft Program Office
Federal Aviation Administration
800 Independence Avenue, SW
Washington, DC 20591

Dear Mr. Davis,

The U. S. Customs and Border Protection (CBP) Unmanned Aircraft Systems (UAS) Program Office assessment of its fleet of MQ-9 Predator B aircraft (and components) finds them to be airworthy to operate in the National Airspace System (NAS) in both the line of site (LOS) and beyond line of site (BLOS) command and control modes in support of its Department of Homeland Security mission.

This assessment is based on our 1400+ hours of flight experience flying the NAS. In addition to this flight experience, the CBP UAS Program Office has implemented multiple technical and programmatic procedures to ensure that airworthiness of the aircraft is maintained as new technologies are introduced into the system.

In October 2006, the UAS Program Office initiated a complete Initial Operational Test and Evaluation (IOT&E) to test, validate and document the UAS capability to operate and perform its assigned missions. As the CBP UAS Program adds additional aircraft systems or adds capability to the baseline program (i.e., a new sensor package, new communications systems, satellite communications for BLOS) it must first complete a rigorous testing program. The initial acceptance of the aircraft from the contractor is via an Acceptance Test Plan (ATP) developed by the contractor and approved by CBP Air and Marine (A&M) engineers. Any new capability or modification to the baseline is subject to contractor developmental test (DT) prior to acceptance. Upon completion of the ATP, any new capability is evaluated in an operational environment as part of an Initial Operational Test and Evaluation (IOT&E) program. The results are then briefed to Assistant Commissioner, CBP A&M for approval to add to the baseline program. For all phases of the test program, both the contractor and CBP UAS agree on the test plan prior to the conduct of the test.

CBP UAS has assembled a Configuration Control Committee to review, approve, and track, recommended hardware and software changes via Configuration Control Change Requests (CCCR) to the CBP UAS fleet and its components. The CBP UAS Program developed a UAS CCCR process that is approved by both the UAS Program Director and Executive Director of Mission Support, and parallels the current CBP A&M CCCR process. The committee has representation from Headquarters A&M, Safety, a Government Flight Representative (GFR), the Air and Marine Operations Center (AMOC), National Aviation Test Center (NATC),

Mr. Douglas Davis

Page 2

Headquarters Engineering, and other subject matter experts when needed. The UAS Configuration Control Committee reviews the proposed technology changes captured in the CCCR package, evaluate the risk of implementing the changes, as well as collaborating with other users of the Predator B aircraft (i.e., USAF, NASA). After the completion of this process the committee recommendations are forwarded to the UAS Program Director and A&M leadership for approval.

The UAS Program Office established a Risk Management Program, monitored by the headquarters engineering staff. Under this program, the CBP UAS Program Office applies a systematic approach to identify potential risks, and develop mitigation plans in an effort to continue safe operations of the Predator B in the NAS. Identification of Risk items can be made by any member of the UAS Program. Each risk item is evaluated on its probability of occurrence and impact. Technical, programmatic and supportability risk items are identified and quantified monitored and reviewed on a periodic basis.

UAS Program Office developed and incorporated an Unmanned Aircraft System (UAS) Supplement to the U.S. Customs and Border Protection, Office of Air and Marine Aviation Operators Handbook (AOH) for UAS Predator B. The UAS supplement to the AOH aligns UAS operations with CBP Air and Marine Aviation Test, Training, Standardization and Safety (ATTSS). Headquarters ATTSS provides oversight of the respective functions and the NATC provides specific input on training and standardization.

Based on our flight experience and the implementation of these formal processes by the CBP A&M Office of Air, Test, Training, Safety and Standards (ATTSS), CBP A&M finds the CPB UAS Predator B fleet to be airworthy. CBP UAS will continually strive to implement improvements in procedures and technology to ensure that safety remains the highest priority in UAS operations.

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