ALARACT 029/2019
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SUBJ/ALARACT 029/2019 - CONSOLIDATED DOD-ARMY COTS UAS CYBER SECURITY WAIVER BUSINESS RULES


NARR: (U) THIS ALARACT MESSAGE PROVIDES A CONSOLIDATION OF ARMY COMMERCIAL-OFF-THE-SHELF (COTS) UNMANNED AIRCRAFT SYSTEMS (UAS) BUSINESS RULES FOR ORGANIZATIONS SUBMITTING OR RENEWING AN EXCEPTION TO POLICY WAIVER REQUEST AND THE CONTINUED NEED FOR ALL ARMY UNITS TO UPDATE MONTHLY COTS UAS INVENTORY NUMBERS.

1. (U) REFERENCES.


1.F. (U) ARMY POLICY MEMORANDUM, ARMY POLICY FOR UNMANNED AIRCRAFT SYSTEMS ON ARMY INSTALLATIONS, DATED: 01 AUGUST 2017.


1.N. (U) DODI 8510.01 - RISK MANAGEMENT FRAMEWORK FOR DOD INFORMATION TECHNOLOGY, INCORPORATING CHANGE 2, DATED: 28 JULY 2017.


3.A. (U/FOUO) THIS POLICY ALSO EXTENDS TO COTS UAS USED FOR RECREATIONAL (HOBBY OR PERSONAL USE) PURPOSES ON ARMY INSTALLATIONS AND CONTRACTOR-OWNED COTS UAS OPERATED BY OR IN SUPPORT OF GOVERNMENT OPERATIONS OR TESTING (REFERENCE 1.O).


3.A.2. (U/FOUO) ORGANIZATIONS WITH AN ACTIVE APPROVAL WAIVER(S) DO NOT HAVE TO RESUBMIT A NEW REQUEST UNLESS ALTERING OR RENEWING THE EXISTING WAIVER.

3.B. (U/FOUO) THE ARMY AUTHORIZING OFFICIALS, ARE CO-DEFINED AS THE ARMY ACQUISITION EXECUTIVE (AAE) AND ARMY CHIEF INFORMATION OFFICER (CIO/G-6). BOTH WILL REVIEW EACH REQUEST ON A CASE-BY-CASE BASIS, TRACK WAIVERS, AND CERTIFY THAT ALL SPECIFIED MITIGATION PROCEDURES REQUIRED ARE AGREED TO BY THE REQUESTOR.

4. (U) DEFINITIONS.

4.A. (U/FOUO) COT SYSTEMS ARE DEFINED AS:

4.A.1. (U/FOUO) ALL UAS SYSTEMS SOLD IN SUBSTANTIAL QUANTITY IN THE MARKETPLACE AND OFFERED TO THE GOVERNMENT IN THE SAME FORM IN WHICH IT IS SOLD TO NON-GOVERNMENT CONSUMERS. UAS SYSTEMS ARE COMMERCIALLY AVAILABLE TO THE PUBLIC FROM BOTH DOMESTIC AND FOREIGN MANUFACTURERS.

4.A.2. (U/FOUO) ALL UAS THAT WERE COMMERCIALLY AVAILABLE IN ORIGINAL FORM, BUT HAVE BEEN MODIFIED WITH DIFFERENT HARDWARE, SOFTWARE, OR PAYLOADS.
4.A.3. (U/FOUO) ALL UAS GROUND COMMAND AND CONTROL ELEMENTS TO INCLUDE SMART PHONE OR TABLET WITH ASSOCIATED SOFTWARE AND HARDWARE.

4.B. (U/FOUO) EXEMPT SYSTEMS ARE DEFINED AS UAS SYSTEMS THAT ARE A FORMAL "PROGRAM OF RECORD" AND MANAGED BY AN ARMY PROGRAM EXECUTIVE OFFICE (PEO); HAVE AN AUTHORITY TO OPERATE (ATO), COMPLYING WITH DOD INSTRUCTION 8510.01, AND HAVE A COMPLETED CYBER VULNERABILITY ASSESSMENT FOR THE SYSTEM.

4.C. (U) SUBMISSIONS WILL BE CONSIDERED ON A CASE-BY-CASE BASIS FOR THE FOLLOWING SIX (6) ACTIVITIES:

4.C.1. (U/FOUO) CRITICAL OPERATIONS WITH NO ALTERNATIVE SOLUTION.

4.C.2. (U/FOUO) COUNTER-UAS SURROGATE TESTING/TRAINING.

4.C.3. (U/FOUO) INTELLIGENCE AND INFORMATION WARFARE TESTING, ANALYSIS, AND TRAINING.

4.C.4. (U/FOUO) ANALYSIS, AND TRAINING.

4.C.5. (U/FOUO) RESEARCH AND DEVELOPMENT (R&D).

4.C.6. (U/FOUO) DEMONSTRATIONS FOR COTS UAS.

4.D. (U/FOUO) ARMY AUTHORIZING OFFICIALS ARE CURRENTLY LIMITED TO APPROVING PROCUREMENT AND USE CASES THAT MEET THE "BENIGN" AND "CONTROLLED" ENVIRONMENT(S) DEFINITIONS FOR R&D, TRAINING (EDUCATION) AND/OR FOR A COTS UAS DEMONSTRATIONS.

4.D.1. (U/FOUO) BENIGN ENVIRONMENT:


4.D.1.B. (U/FOUO) ALL INFORMATION/DATA GENERATED OR COLLECTED DURING THE USER EVENT IS APPROVED AND APPROPRIATE FOR PUBLIC RELEASE TO INCLUDE VIDEO, PICTURES, SIGNALS, SIGNATURES, OR ANY OTHER EVENT INFORMATION.

4.D.1.C. (U/FOUO) DOD FACILITIES/BASES, DEFENSE INDUSTRIAL BASE (DIB) LOCATIONS, OR DEFENSE CRITICAL INFRASTRUCTURE (DCI) ARE PRESUMED TO NOT BE BENIGN ENVIRONMENTS. IF REQUESTORS AFFIRM FOR A PARTICULAR USE CASE THAT THE ARMY EVENT LOCATION IS SANITIZED, MEETS ALL THE CRITERIA OF A BENIGN ENVIRONMENT, AND APPROPRIATE CONTROLS ARE IMPLEMENTED TO KEEP ALL EVENT ACTIVITIES WITHIN THE APPROVED BOUNDARY, ARMY AUTHORIZING OFFICIAL WILL CONSIDER THE ETP REQUEST.


4.D.2. (U/FOUO) CONTROLLED ENVIRONMENT:

4.D.2.A. (U/FOUO) ARMY (OR NON-ARMY) ENTITY EXECUTING THE USER EVENT HAS PHYSICALLY RESTRICTED ACCESS TO THE LOCATION. THE LOCATION OF THE EVENT HAS APPROPRIATE STAND-OFF SUCH THAT WIRELESS DATA LINKS (C2 AND PAYLOAD/SENSOR LINKS) TO AND FROM THE UAS AND THE GROUND CONTROL STATION (GCS) ARE CONTAINED WITHIN THE CONTROLLED ENVIRONMENT AND
CANNOT BE DETECTED OR COLLECTED BY AN UNAUTHORIZED SENSOR OUTSIDE THE CONTROLLED AREA.


4.D.2.C. (U/FOUO) INDOOR USE CASE LOCATIONS, WHERE THE SIGNAL ENVIRONMENT IS CONTROLLED.

4.D.2.D. (U/FOUO) INFORMATION REGARDING ALL FACILITIES, EQUIPMENT, PERSONNEL, AND ACTIVITIES WHERE THE COTS UAS IS OPERATING ARE NOT CLASSIFIED, BUT MAY BE SENSITIVE AND MAY NOT BE PUBLICLY RELEASABLE.

4.D.2.E. (U/FOUO) IN ALL USE CASES, NO CLASSIFIED INFORMATION CAN BE COLLECTED OR OBSERVED.

4.E. (U/FOUO) UNCONTROLLED ENVIRONMENT (DEFINITION). THOSE ENVIRONMENTS (TEST, TRAINING OR OPERATIONAL) THAT CARRY THE POTENTIAL TO EXPOSE TROOP LOCATION, TACTICAL OR STRATEGIC INFORMATION, TTPS, CRITICAL INFRASTRUCTURE, OR SENSITIVE EQUIPMENT; ALL ENVIRONMENTS WHERE THERE IS A RISK TO LOSING THE PLATFORM IN AN ADVERSARY LOCATION; ALL ENVIRONMENTS IN WHICH THE RF SPECTRUM IS UNKNOWN OR CANNOT BE CONTROLLED AND THERE IS RISK OF EXPOSURE OF STRATEGIC, TACTICAL, SENSITIVE, OR NON-PUBLIC INFORMATION.


5. (U) THE FOLLOWING COTS UAS BUSINESS RULES ARE EFFECTIVE ACROSS THE ARMY IMMEDIATELY. PREVIOUS SUBMITTAL METHODS ARE RESCINDED.

5.A. (U) FOR RISK ASSUMPTION PURPOSES, THE ARMY SECRETARY (ARSEC) STAFF REQUIRES EACH REQUEST SUBMITTED TO THE SIPRNET SHAREPOINT INCLUDE A SENIOR COMMANDER MEMO OR LETTER ENDORSING THE WAIVER ON ALL INSTALLATION.

5.B. (U) ALL ARMY COTS UAS EXCEPTION REQUESTS, WITH COVER LETTER, WILL BE FORWARDED TO THE HQDA SIPRNET SHAREPOINT (HTTPS://INTELSHARE.INTELINK.SGOV.GOV/SITES/COTSUASETP), 45 DAYS PRIOR TO START OF YOUR SCHEDULED EVENT. URGENT REQUESTS (LESS THAN 45 DAYS PRIOR TO EXECUTION) WILL BE PROCESSED ON A CASE-BY-CASE BASIS AND WILL REQUIRE DOCUMENTED RATIONALE FROM A FLAG OFFICER, GENERAL OFFICER, OR SENIOR EXECUTIVE SERVICE (FO/GO/SES).

5.C. (U) EXCEPTION REQUESTS WILL BE SPECIFIC TO THE REQUESTING UNIT, THE COTS UAS MODEL/VERSION, MITIGATION PROCEDURES, LOCATION(S), AND DATE, AND TYPE OF EVENT. PLEASE BE ADVISED, HQDA IS NOT ALLOWED TO APPROVE A BLANKET WAIVER.

5.D. (U) THE FOLLOWING INFORMATION IS MANDATORY IN ORDER TO PROCESS FUTURE REQUESTS IN ACCORDANCE WITH (IAW) REFERENCE 1.C ABOVE.

5.D.1. (U/FOUO) ARMY/ UNIT REQUESTING NAME (SPELL-OUT NAME) AND ADDRESS.

5.D.2. (U/FOUO) TYPE OF REQUEST (EXCEPTION OR A RENEWAL).

5.D.3. (U/FOUO) POINT OF CONTACT (POC) NAME(S), CONTACT INFORMATION (PLEASE INCLUDE SECURE INTERNET PROTOCOL ROUTER NETWORK (SIPRNET) E-MAIL). POC MUST BE PREPARED TO DEFEND REQUESTS VIA SECURE VIDEO TELECONFERENCE (SVTC) OR IN PERSON TO OSD/HQDA REVIEW BOARDS.
5.D.4. (U/FOUO) RATIONALE FOR THE NEED AND JUSTIFICATION FOR URGENCY.

5.D.5. (U/FOUO) CONCEPT OF OPERATIONS (BRIEF DESCRIPTION ONLY).

5.D.6. (U/FOUO) DATES/TIMES/EVENT STATUS.

5.D.7. (U/FOUO) SPECIFIC OPERATING LOCATION(S) (INCLUDE RANGE MAPS AND TARGET AREA PICTURES WITH LATITUDE AND LONGITUDE COORDINATES TO THE CENTER OF THE OPERATIONS AREA).


5.D.9. (U/FOUO) NAME ALL COTS UAS STORAGE LOCATION(S) HOME AND DEPLOYED.

5.D.10. (U/FOUO) BRIEF DESCRIPTION OF COTS UAS EQUIPMENT MUST INCLUDE: 1) MAKE, 2) QUANTITY, 3) MANUFACTURE, 4) COMMAND AND CONTROL (C2) APPLICATION AND DEVICE, 5) C2 FLIGHT MODE, 6) C2 FIRMWARE/SOFTWARE, 7) C2 LINK ENCRYPTION, 8) CAMERA LINK ENCRYPTION, 9) CAMERA LINK DATA, 10) CAMERA DATA CONTROL, 11) PAYLOAD LINK ENCRYPTION, 12) SENSOR PAYLOAD CONTROL, 13) SENSOR PAYLOAD MODE, 14) DID YOU CONDUCT A CYBER VULNERABILITY ASSESSMENT? IF SO, DATE OF ASSESSMENT, 15) TYPES OF RADIOS/FREQUENCIES, 16) WHAT ARE YOU USING AS YOUR GROUND CONTROL SYSTEM (GCS)?, 17) AIRWORTHINESS CERTIFICATION AND IF THERE IS AN AUTHORITY TO OPERATE (ATO) DATE, AND 18) UAS MAXIMUM OPERATIONAL ALTITUDE.

5.D.11. (U/FOUO) SHORT DESCRIPTION OF YOUR PRE-MISSION AND POST-MISSION CYBER SECURITY PROCEDURE(S). IDENTIFY ALL MITIGATION MEASURES YOU WILL BE TAKING DURING THE CASE EVENT(S); ADDITIONAL INFORMATION MAY BE INCLUDED AS REQUIRED AND WILL BE LABELED AS ANNEX(ES).


5.E. (U/FOUO) FAA COMPLIANCE.

5.E.1. (U/FOUO) ARMY ORGANIZATIONS MUST HAVE AN FAA AUTHORIZATION TO OPERATE A UAS IN THE NATIONAL AIRSPACE SYSTEM (NAS) PRIOR TO REQUESTING A COTS UAS EXCEPTION TO POLICY WAIVER. FAA AUTHORIZATIONS WILL BE IN ACCORDANCE WITH THE DOD/FAA MOA CONCERNING OPERATIONS OF DOD UAS IN THE NAS; AR 95-1, CHAPTER 9 (NONSTANDARD AIRCRAFT); AR 95-2, CHAPTER 7 (SPECIAL MILITARY OPERATIONS); AR 70-62, CHAPTER 2 (AIRWORTHINESS PROCESS); AND SECDEF MEMO, SUBJ: GUIDANCE FOR THE DOMESTIC USE OF UNMANNED AIRCRAFT SYSTEMS IN U.S. NATIONAL AIRSPACE (REFERENCE 1.G, 1.H, AND MORE).

5.E.2. (U/FOUO) ARMY ORGANIZATIONS OPERATING IN RESTRICTED AIRSPACE ARE NOT REQUIRED TO HAVE A FAA AUTHORIZATION.

5.E.3. (U/FOUO) ARMY ORGANIZATIONS ARE NOT AUTHORIZED TO OPERATE A UAS UNDER AN FAA PART 107 AUTHORIZATION. ORGANIZATIONS WISHING TO OPERATE A UAS CONTRARY TO THE RULES IN
PART 107 MUST REQUEST A WAIVER (REFERENCE HTTPS://WWW.FAA.GOV/UAS/COMMERCIAL_OPERATORS/PART_107_WAIVERS/).

5.E.4. (U/FOUO) ARMY ORGANIZATIONS WITH A PREVIOUS OSD COTS UAS EXCEPTION WILL PROVIDE DAMO-AV-A (USAASA) WITH A COPY OF THEIR FAA AUTHORIZATION TO OPERATE IN THE NAS. ARMY ORGANIZATIONS WITHOUT AN FAA AUTHORIZATION TO OPERATE IN THE NAS ARE PROHIBITED FROM DOING SO AND WILL CEASE OPERATIONS UNTIL AN AUTHORIZATION IS OBTAINED.

5.F. (U/FOUO) THIS GUIDANCE DOES NOT SUPERSEDE REQUIREMENTS LISTED IN ANY OF THE ABOVE REFERENCES.

6. (U) POINTS OF CONTACT.

6.A. (U) ARSEC ASA (ALT) POC IS JANET BOOTS, (703) 697-2012, JANET.M.BOOTS.CIV@MAIL.SMIL.MIL.

6.B. (U) (U) ARSEC CIO/G-6 POCS ARE CLYDEA M. ALLAIRE, (571) 256-8931, CLYDEA.M.ALLAIRE.CIV@MAIL.MIL; MR. CHRISTIAN B. THOMAS, (703) 545-1732, CHRISTIAN.B.THOMAS2.CTR@MAIL.MIL; MR. ROBERT R. LANDRY, (703) 545-6562, ROBERT.R.LANDRY3.CTR@MAIL.MIL; MR. IAN.O.PALMER-DAVIES, (703) 545-4601 IAN.O.PALMERDAVIES.CTR@MAIL.MIL.

6.C. (U) DCS, G-3/5/7 (DAMO-AV) POC ARE CW5 FRANK G. VOLPE, (703) 614-9879, FRANK.G.VOLPE.MIL@MAIL.MIL AND MR. BARNEY C. OWENS, DAMO-AV-A (USAASA), 703 806-4865, BARNEY.C.OWENS.CIV@MAIL.MIL.

6.D. (U) DCS, G-3/5/7 (DAMO-OD) POC IS MR. LELAND A. BROWNING, (703) 697-4916, LELAND.A.BROWNING.CIV@MAIL.MIL AND JILL C. PESCE, (703) 697-0414, JILL.C.PESCE.CTR@MAIL.MIL.

6.E. (U) DCS, G-3/5/7 (DAMO-AP) POC IS LOUIS D. BARNUM, (703) 692-5810, LOUIS.D.BARNUM.CTR@MAIL.MIL OR MR. JOHN PAUL COOK, (703) 692-4821, JOHN.P.COOK24.CTR@MAIL.MIL.

6.F. (U) DCS, G-3/5/7 (DAMO-ZCF (FIRES)) POC IS MAJ ANDREW (DREW) L. MCCOLLUM, (703) 692-8383), ANDREW.L.MCCOLLUM2.MIL@MAIL.MIL OR LTC DEMETRIOS A. GHIKAS, (703) 692-8380 DEMETRIOS.A.GHIKAS.MIL@MAIL.MIL.

6.G. (U) NATIONAL GUARD BUREAU (UAS AVIATION AND SAFETY DIVISION) POC IS MS. CHRISTINA M. ENGH, (703) 607-9089, CHRISTINA.M.ENGH.CIV@MAIL.MIL.

6.H. (U) DCS, G-44 (DALO-SPA) POC IS CW5 CHERYL M. BARTLY, (703) 614-4264 OR (703) 695-0104; CHERYL.M.BARTLY.MIL@MAIL.MIL.

7. (U) THIS ALARACT MESSAGE EXPIRES ON 9 APRIL 2020.