

Product Labeling.

Category 2 and 3. Small UAS qualified for Category 2 or 3 operations must be labeled to indicate each category for which the small UAS is qualified to operate. The label must be in English, legible, prominent, and affixed onto the small UA by some permanent means. A remote pilot is required to ensure his or her small UA is properly labeled before conducting any operations over people. Because operating limitations apply to operations under Category 3, the label on the small UA indicating eligibility for operations under Category 2 and 3 also serves to inform the remote pilot of the operating limitations that he or she is required to observe.

A person may label the aircraft by any means as long as the label is in the English language, legible, prominent, and clearly identifies the category of operations the small UAS may conduct. Because a small UAS could be qualified to conduct more than one category of operations, the aircraft must be labeled for each category of operations the small UAS is qualified to conduct. For example, a manufacturer may use the following labels: “Category 2”, “Category 3”, “Cat. 2”, or “Cat. 3”. The label could be painted, etched, or affixed to the aircraft by some other permanent means. The label should be located where it can easily be seen. The FAA does not prescribe a specific location for label placement because of the design variations of small unmanned aircraft. In the case of very small UA, a manufacturer may need to exercise creativity in determining the location best suited to satisfying the labeling requirement. Locating a label on a non-critical surface will likely prevent wear and removal during normal operations.

Because a label may fall off or become illegible, the FAA allows the remote pilot to re-affix or re-label the aircraft. The remote pilot must ensure the label remains affixed to the small UA for the duration of the operation.

In addition to the requirement for labeling, a remote pilot must also ensure his or her small UA is properly labeled before conducting any operations over people. A clear and legible label is essential for enabling a remote pilot, an inspector, or a member of the public to identify the types of operations a small UA may conduct. Accordingly, an aircraft without a clearly legible label would not be permitted to operate over people. If a label degrades such that it is no longer legible or attached to the aircraft, the remote pilot is responsible for providing a new label before operating over people. The labeling requirement applies regardless of whether a small UAS is obtained directly from a manufacturer or as a subsequent transfer. No pilot is able to operate the small UAS unless he or she verifies that the label meets the requirements of this rule. If the small UAS was manufactured before the effective date of this rule, or the small UAS was otherwise not labeled, the remote pilot is responsible for determining whether the FAA has accepted a DoC for that small UAS. If the aircraft is eligible to operate over people, the remote pilot is responsible for labeling the aircraft in accordance with this rule.

A label may change if a small UA is modified such that it is qualified to operate in a different or additional category. If the small UA has been modified such that it is no longer qualified to operate in its previously labeled category, the person who performed the modification would have to remove or cover the previous label so only the label with the newly qualified category would be visible on the aircraft.