

SB2172

Measure Title: RELATING TO UNMANNED AERIAL VEHICLES.

Report Title: Department of Commerce and Consumer Affairs; Unmanned Aerial Vehicles; Restrictions on Use; Violation of Privacy

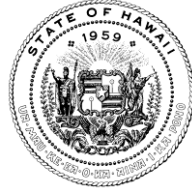
Description: Establishes restrictions on use of unmanned aerial vehicles. Amends the offenses of violation of privacy in the first and second degrees to specifically address the use of unmanned aerial vehicles in the commission of these offenses.

Companion:

Package: None

Current Referral: CPH/JDL, WAM

Introducer(s): ESPERO, BAKER, NISHIHARA, Kidani, Wakai



DAVID Y. IGE
GOVERNOR
SHAN S. TSUTSUI
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**PRESENTATION OF THE
DEPARTMENT OF COMMERCE AND CONSUMER AFFAIRS**

TO THE SENATE COMMITTEE ON
COMMERCE, CONSUMER PROTECTION, AND HEALTH
AND
TO THE SENATE COMMITTEE ON JUDICIARY AND LABOR

TWENTY-EIGHTH LEGISLATURE
Regular Session of 2016
Friday, February 12, 2016
9:00 a.m.

**TESTIMONY ON SENATE BILL NO. 2172, RELATING TO UNMANNED AERIAL
VEHICLES.**

TO THE HONORABLE ROSALYN H. BAKER, CHAIR,
TO THE HONORABLE GILBERT S.C. KEITH-AGARAN, CHAIR,
AND MEMBERS OF THE COMMITTEES:

My name is Catherine Awakuni Colón, Director of the Department of Commerce and Consumer Affairs (“DCCA” or “Department”). DCCA appreciates the opportunity to offer comments on Senate Bill No. 2172, Relating to Unmanned Aerial Vehicles.

Senate Bill No. 2172 requires regulation of unmanned aerial vehicles (“UAVs”). DCCA must adopt, amend, and/or repeal administrative rules necessary to regulate UAVs; impose fines on violators, where appropriate; and investigate any reported violations of the proposed UAV laws and rules. Prohibited acts and punishments

involving UAVs are delineated, permissible uses and exceptions are established, allowable civil causes of action are listed, and UAV activity violating personal privacies is deemed a criminal violation under Chapter 711, Hawaii Revised Statutes (“HRS”).

DCCA takes no position with respect to Sections 3 through 6 of this measure that make certain UAV uses unlawful criminal activity within different provisions of HRS Chapter 711 (criminal offenses against public order). As DCCA’s responsibilities cover regulation of commercial and consumer activity in the State, the Department would respectfully defer to the Legislature and the appropriate law enforcement agencies regarding any amendments to the Hawaii Penal Code.

With respect to Section 2 of this measure, DCCA has strong concerns that the regulation of UAVs as a general activity is outside the scope of DCCA’s mission and would potentially also be outside its jurisdiction as a state agency. DCCA’s mission is to protect the interests of Hawaii consumers, depositors, and investors. To achieve this mission, the Department is charged specifically with regulating trades, businesses, and professions. Senate Bill No. 2172 would make DCCA responsible for overseeing any UAV operations in the State for broad purposes beyond the regulation of commerce or consumer matters, including prosecuting law enforcement and public safety agencies for violations. For example, the measure defines “operators” of UAVs as “any person using or operating [a UAV]” regardless of whether that person is engaged in any business or commercial activity, and also regardless of whether that person’s activity is somehow affecting an identified consumer class or type of transaction. Prohibited acts of UAV operators subject to DCCA regulation would include:

- Unauthorized use of UAVs for collection of personal information or publication of personal information, no matter if the activity is business/consumer related;
- Unauthorized operation of UAVs within unsafe distances to critical public facilities (e.g., water and electric utility infrastructure);
- Unauthorized operation of UAVs over certain facilities that include schools, hospitals, and places of worship.

Of the prohibited acts and various other limitations that DCCA would have to regulate, there is no nexus to commercial or consumer activity. As use of UAVs has spread among individual citizens as hobbyists or other enthusiasts, the Department is concerned that this measure would significantly expand its purview beyond commerce and consumer affairs and into the area of general public safety.

The Department supports the Legislature's efforts to ensure the safety and security of its citizens, so it would not recommend limiting consideration of UAV issues just to the area of commerce and consumer protection.

Finally, DCCA would note that the Committees may want to consider whether some of the prohibited acts and limitations listed in this measure would be preempted by federal regulation of airspace with respect to flight altitude, flight paths, and other possible issues over which the federal government has exclusive jurisdiction.¹

Thank you for the opportunity to provide comments on this measure. I am happy to answer any questions the Committees may have.

¹See the Federal Aviation Administration's fact sheet dated December 17, 2015 concerning state and local regulation of Unmanned Aircraft Systems at http://www.faa.gov/uas/regulations_policies/media/UAS_Fact_Sheet_Final.pdf.



**DEPARTMENT OF BUSINESS,
ECONOMIC DEVELOPMENT & TOURISM**

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DAVID Y. IGE
GOVERNOR

LUIS P. SALAVERIA
DIRECTOR

MARY ALICE EVANS
DEPUTY DIRECTOR

Statement of
LUIS P. SALAVERIA
Director
Department of Business, Economic Development, and Tourism

before the
**SENATE COMMITTEE ON COMMERCE,
CONSUMER PROTECTION, AND HEALTH**
and the
SENATE COMMITTEE ON JUDICIARY AND LABOR

Friday, February 12, 2016
9:00 a.m.
State Capitol, Conference Room 16

in consideration of
SB 2172
RELATING TO UNMANNED AERIAL VEHICLES.

Chairs Baker and Keith-Agaran, Vice Chairs Kidani and Shimabukuro, and Members of the Committees. The Department of Business, Economic Development, and Tourism (DBEDT) has concerns regarding this legislation, which is intended to establish unmanned aerial vehicle (UAV) laws and rules that complement federal rules and regulations.

This measure's definition of an "unmanned aerial vehicle" (page 3) states that it "does not include a remote controlled airplane." Unless the word "model" is inserted to qualify this definition, it will cover a broad range of aircraft, including those that are properly designated to operate as "UAVs." This measure would also prohibit operation of UAVs "within five miles of an airport" (page 4), which would preclude UAV research flights and significantly limit the airport operator's authority [the Federal Aviation Administration already prohibits UAS from operating within five miles of an airport without tower approval].

In addition, this measure would prohibit UAV operations "at an altitude higher than four hundred feet above ground level," which would preempt future UAV operators from seeking a Certificate of Authorization from the FAA to operate a UAV at higher altitudes which, in turn, would seriously constrain operations of the Pan Pacific UAS Test Range Complex – one of six FAA-designated UAS test ranges involving the states of Alaska, Oregon, and Hawaii, with a charter to help safely integrate UAS into the national air space. The FAA already regulates altitude restrictions and flying beyond "line of sight."

Thank you for the opportunity to testify on this measure.

POLICE DEPARTMENT
CITY AND COUNTY OF HONOLULU

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CARY OKIMOTO
DEPUTY CHIEFS

OUR REFERENCE MT-MM

February 12, 2016

The Honorable Rosalyn H. Baker, Chair
and Members
Committee on Commerce, Consumer Protection,
and Health
The Honorable Gilbert S. C. Keith-Agaran, Chair
and Members
Committee on Judiciary and Labor
State Senate
Hawaii State Capitol
415 South Beretania Street
Honolulu, Hawaii 96813

Dear Chairs Baker and Keith-Agaran and Members:

SUBJECT: Senate Bill No. 2172, Relating to Unmanned Aerial Vehicles (UAVs)

I am Mark E. K. Thompson, Captain of the Specialized Services Division of the Honolulu Police Department (HPD), City and County of Honolulu.

The HPD supports Senate Bill No. 2172, Relating to UAVs, but with some concerns.

UAVs are definitely becoming increasingly popular in Hawaii and there is a need to enact laws to address the privacy concerns of the public. The prohibited acts in this bill, as well as the amendments to the offense of violation of privacy in the first degree and violation of privacy in the second degree, address the privacy concerns regarding UAVs.

The HPD conducts their operations in a professional and reputable manner, respecting all privacy laws. The HPD's intent is to use UAVs in an emergency or critical situation where a person's life is in direct jeopardy. This law enforcement exception is supported in this bill.

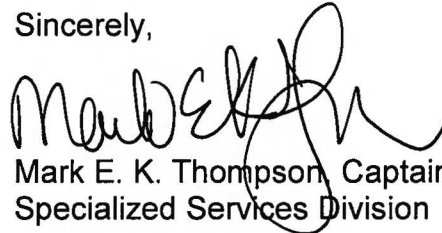
The Honorable Rosalyn H. Baker, Chair
and Members
Committee on Commerce, Consumer Protection,
and Health
The Honorable Gilbert S. C. Keith-Agaran, Chair
and Members
Committee on Judiciary and Labor
February 12, 2016
Page 2

There are possible situations that may necessitate obtaining a search warrant in order to utilize a UAV for investigative purposes. However, this is not always a feasible option and could result in the loss of evidence essential to an investigation. Therefore, the HPD opposes the section "Prohibited uses by law enforcement agencies."

The HPD urges you to support Senate Bill No. 2172, Relating to Unmanned Aerial Vehicles, after removing the "Prohibited uses by law enforcement agencies" section.


Thank you for the opportunity to testify.

Sincerely,



Mark E. K. Thompson, Captain
Specialized Services Division

APPROVED:



Louis M. Kealoha
Chief of Police

To: The Honorable Rosalyn H. Baker, Chair
The Honorable Michelle N. Kidani, Vice Chair
Senate Committee on Commerce, Consumer Protection and Health

The Honorable Gilbert S.C. Keith-Agaran, Chair
The Honorable Maile S.L. Shimabukuro, Vice Chair
Senate Committee on Judiciary and Labor

From: Mark Sektnan, PCI
Christian Rataj, NAMIC
Steve Suchil, AIA

Re: **SB 2172 Relating to Unmanned Aerial Vehicles**
Trade Position: Defer Until 2017

Date: **February 12, 2016 at 9:00 a.m., Room 016**

Aloha Chairs Baker and Keith-Agaran and Members of Committees:

Thank you for providing the National Association of Mutual Insurance Companies (NAMIC), the Property Casualty Insurers Association of America (PCI), and the American Insurance Association (AIA) an opportunity to submit written testimony to your committee for the February 12, 2016, public hearing.

NAMIC, PCI, and AIA (hereinafter "trades") are the largest property/casualty insurance trade associations in the country, serving regional and local insurers, who represent a significant number of policyholders in the Hawaii insurance marketplace.

Unmanned aerial vehicles ("UAV", also known as "UAS" or "drones") represent a new technology with many positive public welfare and consumer services applications for the insurance industry, business community, and governmental entities. The trades appreciate the importance of regulating the lawful use of commercial and recreational drones, so as to promote public safety and responsible UAV use. Commercial operations of UAV, including operations for research and development purposes, are currently prohibited under Federal law without specific FAA approval. In order to use UAV for commercial purposes, a company needs to file a petition with and receive approval from the FAA. A number of insurance companies have received federal permission to use UAV for roof inspections and research and development purposes, including catastrophe scene surveys.

The trades respectfully recommend that the proposed legislation be deferred until next legislative session, because pending Federal Aviation Regulations have yet to be finalized and may end up being in conflict with the proposed state legislation. Moreover, since federal drone law and regulations are evolving in numerous and overlapping arenas - Congress, Commerce Department, FAA, DHS, FTC, FCC, and NTIA, effective state legislative initiatives will require a more clear understanding of both the present and developing legal jurisdictional issues, and a better understanding of the legal relationship between state and federal law on the regulation of UAV. Conflicting and confusing legislation and

regulations at multiple levels of government will adversely impede the development of a uniform body of laws on responsible drone use.

If the State Legislature of Hawaii is unwilling to wait until federal legislation and regulations are fully vetted and implemented, the trades respectfully urge policymakers to consider the following issues pertaining to the legitimate and pro-consumer use of UAV by insurance companies when implementing UAV legislation and regulations:

- The insurance industry wants to use this technology during disasters to help them resolve claims in a fast and efficient manner that promotes public safety. UAV technology presents a new tool to disaster claims management; i.e. a tool that can safely and efficiently survey property damage to help policyholders more quickly recover after the disaster without interfering with the recovery efforts of first responders or posing a safety risk to insurance professionals and policyholders created by having to access potentially dangerous disaster areas to investigate claims. Policymakers should take steps to ensure that insurance companies helping communities recover, after a disaster, have the ability to appropriately use UAV to assist their policyholders.
- UAS technology has important insurance underwriting, and fraud prevention and prosecution capabilities. The trades respectfully urge policymakers to permit insurance companies to use UAV for insurance activities that are permitted pursuant to the insurance policy and consistent with state and federal law. Insurers are diligently committed to being efficient and cost-effective in facilitating their insurance services for the benefit of their insurance consumers. The use of UAV is beneficial to insurance consumers, because insurers will be able to conduct a more thorough assessment of a consumer's personal risk of loss exposure so that the insurer can more accurately match risk to insurance rate. Further, insurers will be able to use drones to fight insurance fraud that costs consumers (non-health insurance consumer) an estimated \$40 billion per year, which translates to \$400 and \$700 per year per family in the form of increased premiums. (FBI statistic).

The trades appreciate the social and legal importance of protecting reasonable privacy rights, and support prohibitions against improper infringement upon a consumer's reasonable expectation of privacy. In fact, the trades and several of their insurance company members participated in the National Telecommunications and Information Administration (NTIA) working group to develop best practices for privacy, accountability, and transparency issues regarding commercial and private use of UAV.

Since the insuring agreement specifically and expressly authorizes the insurer to engage in necessary underwriting and claims adjusting activities, and the consumer, pursuant to the terms of the contractual relationship, has authorized the insurer to look at and evaluate the external condition of the policyholder's home for homeowner's insurance and motor vehicle for auto insurance coverage, the trades believe that the proposed legislation should clearly state that UAV may be used to address these insuring agreement rights and responsibilities.

Consequently, the trades specifically recommend including the following provisions in the bill:

This chapter does not apply to a business entity doing business lawfully in this state, using UAV for legitimate business purposes, and operating the UAV in a manner consistent with applicable FAA rules, licenses or exemptions. Nothing in this section shall preclude a person or entity from utilizing a UAV for

insurance purposes including underwriting, claims investigation, fraud investigation, or other commercial activity as provided in an insurance contract.

In closing, NAMIC, PCI, and AIA recommend that the Hawaii State Legislature wait to enact legislation until the Federal Aviation Administration (FAA) finalizes its rules, and until the National Telecommunications and Information Administration (NTIA) develops its regulatory guidelines. The FAA rules should be finalized in 2016, and since they may preempt certain provisions in state law addressing UAS operations and safety issues, it makes sense to postpone legislation until next session. However, if the State Legislature feels compelled to pass legislation this session, the trades respectfully request that SB 2172 expressly allow for appropriate use of UAV for reasonable, pro-insurance consumer activities that are consistent with the terms of the insuring agreement or in furtherance of the public policy objective of studying how to better assess insurance risk of loss exposure, like the prevention and mitigation of wildfires.

Thank you for your time and consideration. Please feel free to contact us. Christian John Rataj, NAMIC at 303-907-0587, Mark Sektnan, PCI at 916-449-1370 and Steve Suchil at 916-442-7617.

**SENATE COMMITTEE ON
COMMERCE, CONSUMER PROTECTION, AND HEALTH**

AND

**SENATE COMMITTEE ON
JUDICIARY AND LABOR**

February 12, 2016

Senate Bill 2172 Relating to Unmanned Aerial Vehicles

Chair Baker, Vice-Chair Kidani, Chair Keith-Agaran, Vice-Chair Shimabukuro, members of the Senate Committee on Commerce, Consumer Protection, and Health, and Senate Committee on Judiciary and Labor, I am Rick Tsujimura, representing State Farm Mutual Automobile Insurance Company (State Farm).

State Farm offers the following comments about Senate Bill 2172 Relating to Unmanned Aerial Vehicles:

The Hawaii Legislature should be aware that the Federal Aviation Administration (FAA) is poised to finalize its rules on Unmanned Aerial Vehicles. The National Telecommunications and Information Administration's (NTIA) process is developing its rules which will form the basis for the FAA rules. **The FAA rules, which should be finalized sometime in 2016, are especially important, as they will likely preempt state laws addressing UAS operation and safety issues.**

In light of the information contained below, if these Committees decide to approve this legislation, State Farm recommends the following amendment:

This chapter does not apply to a business entity doing business lawfully in this state, using UAS for legitimate business purposes, and operating the UAS in a manner consistent with applicable FAA rules, licenses or exemptions.

Commercial operations of UAS, including for research and development purposes, are currently prohibited under Federal law without specific FAA approval. In order to use UAS for commercial purposes, a company needs to file a petition with and receive approval from the FAA. State Farm is the first insurance company to receive FAA approval to use Unmanned Aircraft Systems (UAS) (or Unmanned Aerial Vehicles, UAV). State Farm commented upon the NTIA efforts to establish a multi-stakeholder engagement process to develop and communicate best practices for privacy, accountability, and transparency issues regarding commercial and private use of UAS, is the recipient of two grants issued pursuant to Section 333 of the FAA Modernization and Reform Act of 2012 (Exemptions No. 11175 and No. 11188) allowing State Farm to use UAS for insurance purposes. Specifically, State Farm has been granted permission to use UAS for roof inspections, and research and development purposes, including catastrophe scene surveys. State Farm believes the use of UAS can benefit the lives and safety of its policyholders, employees, and the general public.

In 2012, the Federal Aviation Administration Modernization and Reform Act (FMRA) was enacted, which requires the FAA to develop regulations for how UAS will operate in U.S. airspace. The law called for regulations to be developed by 2015, and in February 2015 the FAA issued a Notice of Proposed Rulemaking for the Operation and Certification of Small UAS (NPRM), which lays out the agency's proposed regulatory environment for commercial entities. The NPRM offers safety rules for small UAS (under 55 pounds), and the following are:

- Flights are restricted near airports or other restricted airspace;
- UAS can fly up to 100 miles per hour and up to 500 feet above ground level;
- Flights can occur only during daylight hours;
- Flights must be within visual line of sight only;
- Operators must obtain an unmanned operator certificate that is renewable every two years;
- Certificate testing will be widely available at local testing centers;
- A medical exam of operators will not be required; and
- Operators must conduct a pre-flight inspection of the UAS.

In addition, State Farm pointed out a number of areas where the rules can ideally be written to better accommodate UAS uses for insurance purposes. In particular, State Farm:

- Looks to allow for nighttime operations under certain circumstances;
- Also looks to allow for "outside of visual line of sight" operations under certain circumstances; and
- Seeks amendment to rules regarding operating over people, as proposed rules potentially prohibit State Farm from operating over a catastrophe scene.

The FMRA and the NPRM do not include an "express" preemption clause, but courts have clearly stated that the FAA preempts state and local laws dealing with air safety regulations. The FAA recently issued a fact sheet, however, outlining the many areas it believes it preempts state law in regards to UAS regulation. Accordingly, the final FAA rules should form the basis for how UAS are used for commercial purposes in the United States.

State Farm recognizes the importance of addressing privacy as it relates to UAS technology. UAS use cases for insurance industry purposes are an extension of practices most insurers already employ. For example, underwriting or claims inspections would be with the consent of the customer and, if facilitated by a UAS, functionally no different than a traditional human inspection. In addition, UAS use immediately following catastrophes would likely produce minimal privacy concerns, because it would likely be simultaneous with emergency responder fly overs for similar purposes.

Thank you for the opportunity to present this testimony.

From: mailinglist@capitol.hawaii.gov
To: [CPH Testimony](#)
Cc: kalawaiag@hotmail.com
Subject: *Submitted testimony for SB2172 on Feb 12, 2016 09:00AM*
Date: Wednesday, February 03, 2016 12:02:50 PM

SB2172

Submitted on: 2/3/2016

Testimony for CPH/JDL on Feb 12, 2016 09:00AM in Conference Room 229

Submitted By	Organization	Testifier Position	Present at Hearing
Kalawai'a Goo	Individual	Support	No

Comments:

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Subject: *Submitted testimony for SB2172 on Feb 12, 2016 09:00AM*
Date: Friday, February 05, 2016 1:45:46 PM

SB2172

Submitted on: 2/5/2016

Testimony for CPH/JDL on Feb 12, 2016 09:00AM in Conference Room 229

Submitted By	Organization	Testifier Position	Present at Hearing
Dara Carlin, M.A.	Individual	Support	No

Comments:

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Cc: filbertpm@hotmail.com
Subject: Submitted testimony for SB2172 on Feb 12, 2016 09:00AM
Date: Wednesday, February 10, 2016 3:47:19 PM
Attachments: [SB2172 testimony \(10 Feb 16\).docx](#)

SB2172

Submitted on: 2/10/2016

Testimony for CPH/JDL on Feb 12, 2016 09:00AM in Conference Room 016

Submitted By	Organization	Testifier Position	Present at Hearing
Frederic Filbert	Individual	Comments Only	No

Comments: I would like to submit the attached two recommended changes and one addition to this bill. The two changes quantify no night operations or flights over persons and the addition provides an introductory paragraph for prohibitive acts related to drone/UAS operations near or over sensitive and restricted sites

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SB2172 – Relating to Unmanned Aerial Vehicles

- **Change:** -3 Prohibited acts; penalty a.(5) to read “At an altitude higher than four hundred feet above ground level and only during daylight hours;”
- **Change:** - 3 Prohibited acts; penalty a.(9) to read “Over any open air assembly unit, school, school yard, hospital, place of worship, prison, or police station, or persons whether individually, in groups, or in larger crowds,...”
- **Rationale:** Only two of the acknowledged four FAA rules pertaining to drone/UAS use are covered (no higher than 400 feet and within visual line of sight of the operator). Adding the daylight hours and no operations over people items ensures clear understanding that no night operations and no persons over flights occur
- **Add:** as an introduction paragraph to -3 Prohibited acts; a.(10) “Do not fly near or over sensitive infrastructure or property such as correctional facilities, heavily traveled roadways, government and/or military facilities. Do not fly within five nautical miles of stadiums; or conduct unmanned aircraft system flights near or over natural disaster, wildfire, or dedicated search and rescue operations as this will interfere with ongoing operations and could put manned aircraft supporting the effort in danger.”
- **Rationale:** the paragraph launches directly into what should not be done without a lead in statement. Prohibited acts must incorporate direction to preclude flights over all designated prohibited areas. Media reports of unauthorized UAS flights interfering with wildfire operations in California or near/over sensitive

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SB2172

Submitted on: 2/10/2016

Testimony for CPH/JDL on Feb 12, 2016 09:00AM in Conference Room 016

Submitted By	Organization	Testifier Position	Present at Hearing
Frederic Filbert	Individual	Comments Only	No

Comments: I would like to submit the attached two recommended changes and one addition to this bill. The two changes quantify no night operations or flights over persons and the addition provides an introductory paragraph for prohibitive acts related to drone/UAS operations near or over sensitive and restricted sites

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