UNIVERSITY OF ILLINOIS
AT URBANA-CHAMPAIGN

Office of the Vice Chancellor for Research

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April 20, 2015

Mr. John Verdi
National Telecommunications and Information Administration
U.S. Department of Commerce
1401 Constitution Avenue, NW
Room 4725
Attn: UAS RFC 2015
Washington, D.C. 20230
UASrfc2015@ntia.doc.gov

      Re: Privacy, Transparency, and Accountability Issues Associated with Commercial
           and Private Use of Unmanned Aircraft Systems

      Request for Public Comments, March 5, 2015, Federal Register Docket No. 150224183-
      5183-01

Dear Mr. Verdi:

On behalf of the University of Illinois at Urbana-Champaign (Illinois), I am writing to provide
our perspective to the Department of Commerce National Telecommunications and Information
Administration ("NTIA") regarding privacy, transparency, and accountability issues associated
with the commercial and private use of unmanned aircraft systems ("UAS").

Established in 1867, Illinois is a land-grant institution that is home to over 44,000 students, 16
colleges, over 150 programs of study, and a faculty of over 2,500. We are consistently ranked
among the top public research universities in the country. Our campus has a remarkable breadth
of research expertise, with world-renowned strengths in the arts, agriculture, business, the
humanities, and the social sciences, as well as top-ranked programs in the natural sciences and
engineering. Many of the technologies that enabled the modern electronic era were developed at
Illinois, and we are consistently among the top universities in NSF-funded research and
development expenditures. Today, we're building on that tradition, working to address society's
most pressing problems by doing what we do best—interdisciplinary research that drives positive
change in our communities, our state, our nation, and the world.

To achieve that mission, our faculty and research staff must be able to take advantage of the significant benefits of UAS, harnessing their potential to increase America's competitiveness and benefit society. We see real opportunity for research in areas such as:

- aerospace engineering
- animal sciences,
- civil engineering,
- crop sciences,
- engineering controls,
- environmental sciences,
- mechanical engineering,
- and plant biology.

In addition to utilizing UAS themselves, our faculty experts are studying issues ranging from aviation to safety to privacy—issues particularly relevant to the emerging public debate on the use of UAS.
Research underway in all of these disciplines supports the work of federal agencies including NASA, the U.S. Department of Agriculture, the Department of Defense, the Department of Energy, the National Science Foundation, and state agencies including the Illinois Departments of Natural Resources and Transportation. Illinois also has a strong record of technology transfer to the private sector, using such sponsored research to improve the quality of life for people around the globe.

While we are excited about the potential benefits of UAS, we recognize the need to guard against the use of UAS to violate the privacy of faculty, staff or students on campus, as well as the general public. We are pleased to see that the NTIA has established a multi-stakeholder engagement process to develop and communicate best practices for privacy, accountability, and transparency issues regarding commercial and private UAS use. Below, we offer related comments.

Best Practices
Universities and commercial entities operate in different environments, with different motivations for data collection and use of UAS, and should therefore be treated separately as part of any UAS policymaking regime, including the NTIA multi-stakeholder process. Universities already operate under a comprehensive web of laws, rules, regulations, policies and guidance that regulate the behavior of faculty, staff and students on campus. These rules protect against privacy harms and other violations—including any violations associated with the use of UAS. Universities have procedures in place for reporting suspected cases of misuse or abuse of university equipment, including UAS. Moreover, universities maintain policies and procedures that provide oversight of individuals who have access to sensitive information collected using UAS.

While rules to govern university activity and behavior already exist, we are very supportive of NTIA's effort to craft privacy, transparency and accountability best practices to prevent harms associated with commercial use of UAS. We take the privacy and security of Illinois students,

faculty, and employees very seriously, and we share the American public's concern about potential privacy issues associated with UAS operation.

Working Group Structure
The NTIA Working Groups should include all relevant stakeholders, including most particularly academic researchers with specific interest in the subject matter. Academic researchers and educators can offer unique and objective perspectives and we would be pleased to nominate faculty from Illinois to participate on the NTIA Working Groups.

Privacy
Some of the privacy concerns presented by UAS are unique to UAS, but others are not. Often, broadly applicable laws or rules already cover potential privacy violations by cameras and sensors. The policymaking process should focus on privacy harms that are unique to UAS. Further, the different capabilities of UAS of different sizes should be recognized, and precise definitions employed to avoid ambiguity.

Accountability is needed to prevent abuse and to encourage responsible use of UAS, and public disclosure of data retention and other privacy policies is critical to transparency.

Thank you for the opportunity to comment on the development of best practices for the use of UAS. We urge you to consider both the significant economic benefits associated with the commercial and private use of UAS balanced against the privacy, accountability and safety concerns. The NTIA multi-stakeholder process will play an important role in fostering public confidence, and in the establishment of privacy, transparency and accountability protocols for users of UAS.

Sincerely,

Peter Schiffer
Vice Chancellor for Research

c: Starla Carpenter