



OFFICE OF THE VICE PRESIDENT FOR
RESEARCH AND ECONOMIC DEVELOPMENT

2660 University Capitol Centre
Iowa City, Iowa 52242-5500
319-335-2119

20 April 2015

Mr. John Verdi
National Telecommunications and Information Administration
US Department of Commerce
1401 Constitution Avenue, NW
Room 4725
Washington, DC 20230

RE: Response to Request for Comments on Privacy, Transparency, and Accountability Issues Regarding Commercial and Private Use of Unmanned Aircraft Systems (UAS)

Dear Mr. Verdi:

The University of Iowa is **one of the nation's top public research universities**, with over \$400 Million in external funding annually. Founded in 1847, Iowa has been a member of the Association of American Universities since 1909. It's home to one of the nation's largest academic medical centers, the pioneering Iowa Writers' Workshop and 25 graduate programs ranking among the top 25 in the nation. We appreciate this opportunity to provide our perspective to NTIA on issues relating to the privacy, transparency, and accountability of UAS use.

The University of Iowa recognizes the significant economic, educational, and societal benefits of UAS. We are currently using UAS for research and development on our campus and have obtained public Certificates of Authorization (COAs) for those purposes. Because we hope to expand our abilities to use UAS in other University efforts, we are in the process of filing a Section 333 petition for exemption. Our current research activities focus on engineering and environmental uses of UAVs for work supported by state and federal agencies including NASA, DOT and the Department of Defense. In addition, our faculty are experts engaged in public policy issues, including safety and privacy, that are particularly relevant to the NTIA's current efforts on UAS.

We acknowledge that the use of UAS creates not only enormous potential benefits but also significant concerns about privacy. We encourage and support the NTIA's efforts to engage a multi-stakeholder process to discuss the privacy issues involved, and also the important need for accountability and transparency in the use of UAS.

With regard to the NTIA's multi-stakeholder process, we would urge that institutions of higher education be treated differently from commercial entities with regard to their respective UAS use. These two groups are inherently different in a number of ways, ranging from their purposes in using UAS (research and instruction for societal benefit as opposed to commercial profit interests) to the types of data collected with UAS

(scientific as opposed to commercially-valuable information on consumers). Given that research on university campuses is already highly regulated, universities have developed robust processes designed to protect against privacy violations and promote accountability and transparency in our work. This is particularly true of public institutions such as the University of Iowa.

In terms of the NTIA's working groups themselves, we would strongly advocate the inclusion of academic researchers who have particular expertise and interest in the use of UAVs and who can offer unique and objective perspectives on these issues. We would also encourage the inclusion of other university faculty with subject matter expertise on privacy and other policy issues raised.

Finally, with regard to privacy, we would hope that policymakers will treat micro, small, and large UAS platforms differently because they offer different capabilities and because the smaller UAVs are more affordable and available.

As a public institution, the University of Iowa is committed to public accountability and transparency in the use of UAS. In this regard, universities may differ markedly from commercial entities. We would hope that policymakers and those who develop best practices in this area will recognize that difference and make every effort to minimize it as it relates to UAS use.

We commend the NTIA for undertaking this effort and appreciate the opportunity to provide it with our perspective on these issues.

Sincerely,

A handwritten signature in blue ink, appearing to read "Daniel A. Reed". The signature is fluid and cursive, with the first name "Daniel" being the most prominent part.

Daniel A. Reed
Vice President for Research and Economic Development
Computational Science and Bioinformatics Chair
Professor of Computer Science, Electrical and Computer Engineering, and Medicine
University of Iowa