



ORDO

FAA PART 108

COMPLIANCE GUIDE

The complete guide to BVLOS drone operations
Permits • Certificates • Ongoing Conformance

Effective Q1 2026

What is Part 108?

FAA Part 108 is the **first standardized federal framework** for Beyond Visual Line of Sight (BVLOS) drone operations in the United States.

Until now, operators relied on case-by-case waivers and exemptions—a fragmented system that limited growth. Part 108 replaces this patchwork with a clear, scalable pathway for delivery, agriculture, inspection, mapping, and recreational BVLOS operations.

Part 108 is expected to take effect Q1 2026.

Operators who want to be first to market need to start preparing now.

The 7 Fundamental Shifts

1. **One Clear Path** — No more case-by-case waivers. Part 108 becomes the exclusive regulatory pathway for all BVLOS.

2. **No Pilot License** — Organizations bear responsibility, not certificated pilots. The FAA determined piloting skill isn't the primary safety driver for autonomous operations.
3. **Autonomous Flight Only** — Manual joystick control is prohibited. Drones must fly autonomously with simplified command interfaces only.
4. **5 Population Categories** — More people below = stricter requirements. Category 1 (rural) through Category 5 (2,500+ people within 0.5 SM).
5. **Permits vs. Certificates** — Lower-risk operations get permits. Complex operations require full FAA certification with Safety Management Systems.
6. **Traffic Management (ADSPs)** — New Part 146 creates drone traffic management providers for strategic deconfliction and conformance monitoring.
7. **Manufacturer Acceptance** — Every BVLOS drone needs FAA airworthiness acceptance before commercial use.

Key Personnel Requirements

Operations Supervisor (§108.305)

Every operator must designate an Operations Supervisor who holds **final authority over safe and secure operations**. Requirements:

- TSA approval required
- Must understand company policies, aviation safety standards, and Part 108 regulations
- Responsible for ensuring all regulatory compliance

Flight Coordinator (§108.310)

Monitors UAS during operations with ability to control aircraft and initiate emergency actions:

- 5 hours of operating experience on each specific make and model
- **Currency:** 5 hours recency within preceding 12 calendar months
- Experience obtained under direct supervision of qualified personnel

Duty & Rest Limits (§108.330)

Requirement	Limit
Maximum duty day	14 hours
Maximum duty week	50 hours
Rest before duty	10 hours continuous within 24 hours prior
Weekly day off	One day off per week required

Operations Manual (§108.135)

Every operator must maintain a company operations manual documenting **YOUR specific procedures**—not generic templates. Required contents:

- Operations personnel required (including how many)
- Preflight procedures (weight, balance, loading)
- Accident notification procedures
- Procedures to determine and communicate UA condition
- Recordkeeping and reporting procedures
- UA maintenance procedures and inspection criteria
- Emergency procedures
- Procedures for retrieval of UA that fail to return
- Hazardous materials identification and disposition

Recordkeeping & Reporting

Records Required (§108.40)

Operators must maintain records for: aircraft (maintenance, airworthiness, modifications), personnel (qualifications, experience, duty time), mechanical irregularities, maintenance actions, and training.

Reporting Deadlines (§108.45)

Report Type	Deadline
Flight Data	Monthly
Aircraft Summary	Annually (at least once)
Interruption Summary	By 10th of following month
Security Occurrences	Within 7 days
Emergency Conditions	Within 10 days
Event Reporting	Within 10 days

Life-Limited Parts (§108.615)

Components with defined service lives (batteries, motors, propellers) require special handling:

- Cannot exceed approved life of any life-limited part
- Must track status of all life-limited parts continuously
- **Critical:** Expired parts must be destroyed or marked as past life

Population Density Categories

Part 108 classifies operational environments into 5 categories. Higher categories require stricter safety measures:

Category	Definition	Key Requirement
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Cat 1	>1 SM from 10+ people	50 ft from non-participants
Cat 2	Within 1 SM of 10+ people	No Part 15 radio links
Cat 3	Within 1 SM of 25+ people	+ Strategic deconfliction
Cat 4	Within 0.5 SM of 100+ people	+ Operating certificate
Cat 5	Within 0.5 SM of 2,500+ people	+ Detect & avoid (non-coop)

Permits vs. Certificates

Permitted Operations (Simpler Path)

Permits are valid for 24 months. Renewal applications due 120 days before expiration.

Permit Type	Max Aircraft	Max Weight	Population Limit
Package Delivery	100	55 lbs	≤ Cat 3
Agriculture	10	1,320 lbs	Cat 1
Aerial Survey	25	110 lbs	≤ Cat 3
Civic Interest	25	110 lbs	≤ Cat 3
UAS Training	10	1,320 lbs	Cat 1
Demonstration	50	110 lbs	≤ Cat 2
Recreational	1	55 lbs	≤ Cat 3

Certificated Operations (Complex Path)

Required for higher-risk operations—larger aircraft, denser populations, unlimited fleet sizes. Additional requirements:

- Safety Management System (SMS) per 14 CFR Part 5
- Formal training programs for all personnel
- Communications and ground risk assessments (§108.550)
- Pedestrian and moving vehicle analysis
- Inoperative equipment procedures (§108.555)

Airspace & Technology

Detect and Avoid (§108.825)

Ability to see, sense, or detect aircraft/hazards and make flight adjustments. Required for Class B/C airspace and Category 5 operations.

Strategic Deconfliction & Conformance Monitoring

Required when operating in Classes B, C, D, or E2 (≤ 400 ft AGL) or over people in Category 3+ density. Services provided by Automated Data Service Providers (ADSPs) under Part 146.

Aircraft Limits (§108.805)

- Wingspan: ≤ 25 feet
- Weight: $\leq 1,320$ lbs (600 kg)
- Ground speed: ≤ 87 knots

Your Compliance Checklist

To obtain and maintain Part 108 approval:

8. **Create operations manual documenting YOUR specific procedures**
9. **Designate TSA-approved Operations Supervisor**
10. **Log 5 hours per aircraft model for each Flight Coordinator**
11. **Submit flight data to FAA monthly**
12. **Track duty hours and rest periods daily**
13. **Report incidents within 7-10 days**
14. **Track life-limited parts continuously until destroyed**
15. **Reapply 120 days before permit expiration (every 24 months)**

This is a lot to manage. That's why we built Ordo.

Ordo is the compliance platform for Part 108 operators. **Our AI analyzes your specific operations—**fleet, routes, personnel, use cases—to generate personalized documentation. Not generic templates.

- Guided application builder for permits and certificates
- AI-generated SOPs tailored to your operations
- Personnel tracking with automated deadline reminders
- Fleet documentation and life-limited parts tracking
- Built-in Safety Management System framework
- **Export:** One-click audit readiness

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