



Rob McKenna

ATTORNEY GENERAL OF WASHINGTON

1125 Washington Street SE • PO Box 40100 • Olympia WA 98504-0100

August 6, 2012

Randy Willis
Acting Air Traffic Manager
Unmanned Aircraft Systems Office
Federal Aviation Administration
490 L 'Enfant Plaza, Suite 3200
Washington, DC 20024

RE: King County (Washington) Sheriff's Office Application for Operation of Unmanned Aircraft

Dear Mr. Willis:

I was recently contacted by King County Deputy Sheriff Peter Linde regarding an application the King County Sheriff's Office (KCSO) has pending with the Federal Aviation Administration (FAA) to operate certain classes of Unmanned Aircraft within their jurisdiction. As in a prior letter written by me on behalf of the Seattle Police Department, I am advised that in order for the FAA to process the KCSO application, you require a letter from the Washington State Attorney General's Office confirming, essentially, that the KCSO is a unit of government in this state. This is my sole purpose in writing you today.

Washington State, through the Washington State Constitution, provides for the organization of county governments. *See generally* Washington State Constitution, article XI. King County is recognized and organized as a county by the State of Washington. In the King County, Washington Charter, Article 3, The Executive Branch, there is created a Department of Public Safety:

350.20.40 Department of Public Safety. The department of public safety shall be administered by the county sheriff who shall perform the duties specified by general law. The county sheriff shall be elected by the voters of the county, and his or her term of office shall be four years. The department of public safety shall be an executive department subject to the civil service personnel system and shall utilize the services of the administrative offices and the executive departments, but it shall not be abolished or combined with any other executive department or administrative office and shall not have its duties decreased by the county council. (Ord. 12301 § 1, 1996).

ATTORNEY GENERAL OF WASHINGTON

Randy Willis
August 6, 2012
Page 2

Therefore, for purposes of 49 U.S.C. § 40102(a)(41)(C), King County is a political subdivision of the State of Washington and the requested Unmanned Aircraft Systems operations by the KCSO will be public aircraft operations in accordance with that statute. Operational flights performed by KCSO will be non-commercial in nature and conducted in accordance with 49 U.S.C. § 40125.

Sincerely,

A handwritten signature in cursive script that reads "Brian T. Moran". The signature is written in dark ink and has a fluid, connected style.

BRIAN T. MORAN
Chief Deputy Attorney General

BTM/jlg