

**Department of Transportation
Federal Aviation Administration**

**SUPPORTING STATEMENT
Small Unmanned Aircraft Registration System
2120-XXXX**

INTRODUCTION

This information collection is submitted to the Office of Management and Budget (OMB) to request a three-year approval clearance for the information collection entitled Small Unmanned Aircraft Registration System (OMB Control No. 2120-XXXX). This is a new information collection.

Part A. Justification

1. Circumstances that make collection of information necessary. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The Secretary of the Department of Transportation (DOT) and the Administrator of the Federal Aviation Administration (FAA) recently affirmed that all unmanned aircraft, including model aircraft, are aircraft. As such, in accordance with 49 U.S.C. 44101(a) and as further prescribed in 14 CFR part 47, registration is required prior to operation. *See* 80 FR 63912, 63913 (October 22, 2015). Aircraft registration is necessary to ensure personal accountability among all users of the national airspace system. *See id.* Aircraft registration also allows the FAA and law enforcement agencies to address non-compliance by providing the means by which to identify an aircraft's owner and operator.

Subject to certain exceptions, aircraft must be registered prior to operation. *See* 49 U.S.C. 44101-44103. Upon registration, the Administrator must issue a certificate of registration to the aircraft owner. *See* 49 U.S.C. 44103. Because small unmanned aircraft systems (UAS), including model aircraft, involve the operation of "aircraft," the Secretary and the Administrator clarified that the statutory and regulatory aircraft registration requirements apply. *See* 80 FR 63912, October 22, 2015.

Registration, however, does not provide the authority to operate. Persons intending to operate a small unmanned aircraft exclusively as model aircraft must operate in compliance with section 336 of Public Law 112-95. Persons intending to operate their small unmanned aircraft as other than model aircraft must obtain authorization to operate in accordance with an exemption issued under 14 CFR part 11 and section 333 of Public Law 112-95, or in conjunction with the issuance of a special airworthiness certificate.

2. How, by whom, and for what purpose is the information used. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The information collected as part of the small unmanned aircraft registration system will identify

to the FAA those persons owning small unmanned aircraft, whether the intended use is as a model aircraft, or as other than a model aircraft. It will also allow the FAA to provide those persons with educational materials regarding safety of flight in the national airspace system to promote greater accountability and responsibility of these new users of the national airspace system.

3. Extent of automated information collection. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

The part 48 small unmanned aircraft registration system is a fully automated, web-based online registration system. The part 47 process will remain available as an alternative process for small unmanned aircraft owners who wish to use a paper-based registration system.

4. Efforts to identify duplication. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in item 2 above.

The registration of small unmanned aircraft is within the purview of the FAA. Title 49, United States Code, 44101-44106 and 44110-44113 require aircraft to be registered as a condition of operation and establish the requirements for registration and registration processes. No other Federal agency has similar requirements, thus there is no duplication.

The agency expects small unmanned aircraft owners to complete aircraft registration using the part 48 registration process identified in the Interim Final Rule, "Registration and Marking Requirements for Small Unmanned Aircraft", RIN 2120-AK82 (part 48). Alternatively, small unmanned aircraft owners may choose to register their aircraft by using the existing part 47 registration process (OMB Control No. 2120-0042).

5. Efforts to minimize the burden on small businesses. If the collection of information impacts small businesses or other small entities (item 5 of OMB form 83-I), describe any methods used to minimize burden.

The information required to be collected from persons intending to register small unmanned aircraft as other than model aircraft is minimal:

- (1) Applicant name and, for an applicant other than an individual, the name of the authorized representative applying for a Certificate of Aircraft Registration.
- (2) Applicant's physical address and, for an applicant other than an individual, the physical address for the authorized representative. If the applicant or authorized representative does not receive mail at their physical address, a mailing address must also be provided.
- (3) Applicant's e-mail address or, for applicants other than individuals, the e-mail address of the authorized representative.
- (4) The aircraft manufacturer and model name.
- (5) The aircraft serial number, if available.

The FAA believes that the minimal information requested, as well as efforts under way to permit registration of multiple aircraft in one transaction, will significantly reduce any burden this registration system might impose.

The FAA emphasizes that the minimal nature of the information being collected under the small unmanned aircraft registration system discussed in this information collection should be viewed in comparison with the current requirement that persons intending to use small unmanned aircraft other than as model aircraft comply with the significantly more paperwork-intensive requirements of 14 CFR part 47 and OMB information collection 2120-0042. That information collection is estimated to take 30 minutes per response, as compared with the estimate of 5 minutes per response for this information collection.

6. Impact of less frequent collection of information. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

Persons who own small unmanned aircraft are required to register with the FAA prior to operation of those small unmanned aircraft. Registration is effective for three years and must be renewed if the person wishes to continue to use small unmanned aircraft upon the expiration of the Small Unmanned Aircraft Certificate of Registration. This three-year renewal allows the FAA to ensure the accuracy of the information in the registration system.

7. Special circumstances. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **Requiring respondents to report information to the agency more often than quarterly;**
- **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **Requiring respondents to submit more than an original and two copies of any document;**
- **Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances for this information collection.

8. Compliance with 5 CFR 1320.8. Provide an electronic copy and identify the date, volume number and page number of the publication in the Federal Register of the agency's notice (for a 60-day and a 30-day notice), required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB.

- **Summarize public comments received in response to that notice and describe actions taken by the agency in response to those comments. Specifically address comments received on cost and hour burden.**
- **Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**
- **Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years--even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

Prior to publication of the interim final rule entitled Registration and Marking Requirements for Small Unmanned Aircraft (RIN 2120-AK82), the FAA took several steps to consult with persons and organizations potentially affected by the requirement to register small unmanned aircraft.

The Secretary and the Administrator issued an NPRM, "Operation and Certification of Small Unmanned Aircraft Systems" (80 FR 9544 (Feb. 23, 2015)) (sUAS Operation and Certification NPRM), that proposed a framework for integrating small UAS operations in the national airspace system (RIN 2120-AJ60). Specifically, the proposal would address the operation of small UAS, certification of small UAS operators, small UAS registration, and display of registration markings.

The comment period for the sUAS Operation and Certification NPRM closed April 24, 2015. The FAA received more than 4,500 comments on this proposal.

On October 19, 2015, the Secretary of Transportation and the Administrator of the FAA issued a notice in the Federal Register clarifying the applicability of the statutory requirements for aircraft registration to small unmanned aircraft (80 FR 63912, October 22, 2015). That document was entitled Clarification of the Applicability of Aircraft Registration Requirements for Unmanned Aircraft Systems (UAS) and Request for Information Regarding Electronic Registration for UAS (the Clarification/Request for Information). Among other things, the Clarification/Request for Information announced the formation of a UAS Registration Task Force (Task Force) to explore and develop recommendations to streamline the registration process for small unmanned aircraft to ease the burden associated with the existing aircraft registration process. To facilitate the work of the Task Force, the Secretary and the Administrator sought information and data from the public through a number of questions identified in the Federal Register notice. Those questions sought specific information, including information relevant for purposes of this information collection. Those questions included:

Question 5. How should a registration process be designed to minimize burdens and best protect innovation and encourage growth in the UAS industry?

Question 6. Should the registration be electronic or web-based? Are there existing tools that could support an electronic registration process?

Question 7. What type of information should be collected during the registration process to positively identify the aircraft owner and aircraft?

80 FR 63914, October 22, 2015. The comment period for the Clarification/Request for Information closed November 6, 2015. As of November 6, 2015, the FAA received over 4,500 comments on the Clarification/Request for Information. In the Clarification/Request for Information, the DOT stated, “[T]he docket will remain open after this time and the Department will consider all comments received in developing a registration process.” The FAA considered more than 175 additional comments submitted after the close of the comment period.

On October 19, 2015, the FAA chartered the Unmanned Aircraft Systems (UAS) Registration Task force (RTF) Aviation Rulemaking Committee (ARC). The Administrator selected Task Force members based on their familiarity with UAS, aircraft registration policies and procedures, retail inventory control and tracking, and electronic data capture. The membership was comprised of a diverse group of representatives from trade groups representing manned and unmanned aviation, UAS manufacturers and retailers, and law enforcement.

The Task Force was tasked with the following three objectives:

1. Develop and recommend minimum requirements for UAS that would need to be registered.
2. Develop and recommend registration processes.
3. Develop and recommend methods for proving registration and marking.

The Task Force issued its report November 21, 2015.

The small unmanned aircraft registration system provided for in the interim final rule, were developed while taking into consideration the comments received to the sUAS Operation and Certification NPRM that were pertinent to the registration system, comments received to the Clarification/Request for Information, and recommendations of the Task Force.

Of particular note were comments from the public and the Task Force’s recommendations regarding the simplicity and usability of the system, and the data to be collected.

9. Payments or gifts to respondents. Explain any decision to provide a payment or gift to respondents, other than remuneration of contractors or grantees.

No gifts or payments are provided for the registration of small unmanned aircraft.

10. Assurance of confidentiality. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

The Privacy Act System of Records Notice DOT/FAA 801 Aircraft Registration System, provides notice to the public of the agency’s privacy practices regarding the collection, use, sharing, safeguarding, maintenance, and disposal of information that affects individuals and their personally identifiable information (PII). The SORN identifies the routine uses for the PII collected for small unmanned aircraft registration. An updated SORN that addresses the disclosure of the small unmanned aircraft owner’s name and address has been submitted to the Federal Register and is expected to be published on December 15th. The SORN indicates that email addresses and phone numbers will not be released to the public. The current version of the SORN may be found in the Federal Register at 65 FR 19518.

11. Justification for collection of sensitive information. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

This information collection does not collect information of a sensitive nature. Only basic identifying information in the form of name, physical and mailing address (if different than physical address), and email address are collected. The rule requires that persons using the system must be at least 13 years of age to register the small unmanned aircraft.

12. Estimate of burden hours for information requested. Provide estimates of the hour burden of the collection of information. The statement should:

- **Indicate the number of respondents, frequency of responses, calculation for the individual burdens and for the total annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hour for customary and usual business practices**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in item 13 of OMB form 83-I.**

This does not cover more than one form.

- **Provide estimates of annualized cost to respondents for the hourly burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in item 14.**

For the modelers and non-modelers, the following tables show the total number of modelers, their time, and their costs to fill out the online system and register plus the time to re-register and for the non-modelers, the number of total respondents (small unmanned aircraft), their time, and their costs to fill out the online system and register, the time to register each of their small unmanned aircraft, and their time de-register their aircraft after they retire their aircraft. We note that, for non-modelers, this burden is a reduction from that which occurs under the existing paper-based system.

Modelers

The Department anticipates 2.628 million responses from modelers (2.127M registrations+ 0.501 renewals) at 5 minutes each for a total of 218,999 hours (177,249 hours for registrations + 41,750 thousand hours for renewals). On an annual basis the average number of expected modeler respondents is 876,000 (2.628 million / 3) with burden of 73,000 hours.

Modelers						
Year	# of Registrations (M)	Minutes per response	Hours	# of Renewals (M)	Minutes per response	Hours
1	1.25	5	104,166	N/A	5	0
2	0.399	5	33,250	N/A	5	0
3	0.478	5	39,833	0.501	5	41,750
Total	2.127	5	177, 249	0.501	5	41,750

Non-Modelers

Note: Within the forecast period, non-modelers do not incur renewal costs because the individual units are not assumed to last more than one year. Thus, the number of de-registrations is assumed to equal the number of registrations from the previous year.

The Department anticipates 8.753 million responses from non-modelers (5.644M registrations + 3.109 M de-registrations) for a total of 485,851 hours (330,401 hours for registrations + 155,450 hours for renewals). On an annual basis the average number of expected non-modeler respondents is 2.918 million (8.753 million / 3 years) with an annual burden of 161,950 (485,851 hours /3 years).

Non-modelers						
Year	# of Registrations (M)	Minutes per response	Hours 000)	# of De-Registrations (M)	Minutes per response	Hours
1	0.617	3.5	35,992	N/A	3	0
2	2.492	3.5	145,367	0.617	3	30,850
3	2.555	3.5	149,042	2.492	3	124,600
Total	5.644	3.5	330,401	3.109	3	155,450

The total burden for the information collection request 11.381 million responses (2.628 million responses from modelers + 8.753 million responses from non-modelers) requiring 704,851 hours (219,000 hours for modelers and 485,851 hours for non-modelers). On average this equates to 3,793,666 registrations (11.381 million / 3 years) and 234,950 hours per year (704,851 hours / 3 years).

13. Estimate of total annual costs to respondents. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the costs of any hour burden shown in items 12 and 14).

- **Include a breakdown for total capital/start-up costs and operation/maintenance. The cost estimates should be split into two components: (a) a total capital and start-up cost component (annualized over it expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take**

into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major costs factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.

- If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- Generally, estimates should not include purchases of equipment or services, or portions thereof, made (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

The only costs to the respondents are the paperwork costs. There are no capital or operation/maintenance costs for the respondents because of this rule.

14. Estimate of cost to the Federal government. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate costs, which should include quantification of hours, operational expenses such as equipment, overhead, printing, and support staff, and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from items 12, 13, and 14 in a single table.

The following table shows the total and present value costs to the government. An external consultant estimated these costs based on the time and effort it would take to build the registration system.

Year	Calendar Year	FAA Costs (M\$)	7% P.V.
0	2015	\$3.9	\$3.9
1	2016	\$5.0	\$4.7
2	2017	\$3.2	\$2.8
3	2018	\$3.4	\$2.8
4	2019	\$3.0	\$2.3
5	2020	\$2.6	\$1.9
Total		\$21.2	\$18.4

Note: numbers may not add due to rounding

The cost of the information collection for the requested approval period is \$15.5 million dollars, averaged at \$5.167M.

Year	Calendar Year	FAA Costs (\$M)	7% P.V.
0	2015	\$3.9	\$3.9
1	2016	\$5.0	\$4.7
2	2017	\$3.2	\$2.8
3	2018	\$3.4	\$2.8
Total		\$15.5	\$14.2

15. Explanation of program changes or adjustments. Explain the reasons for any program changes or adjustments reported.

This is a new information collection. In the interim final rule entitled Registration and Marking Requirements for Small Unmanned Aircraft (RIN 2120-AK82) the FAA established a registration system for small unmanned aircraft. This registration system provides a streamlined alternative to the paper-based registration system already in existence under 14 CFR part 47 (OMB information collection 2120-0042) for small unmanned aircraft.

16. Publication of results of data collection. For collections of information whose results will be published, outline plans for tabulation, and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Members of the public may search the collection by registration number only. The results of the search will be limited per the Department’s Privacy Act notice DOT/FAA 801 – Aircraft Registration Records.

17. Approval for not displaying the expiration date of OMB approval. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The FAA is not seeking approval not to display the date of expiration of this information collection.

18. Exceptions to certification statement. Explain each exception to the certification statement identified in question 19, "Certification for Paperwork Reduction Act Submissions" (attached).

There are no exceptions to the certification statement for this information collection.