## OMB Collection 2120-0042 Civil Aviation Registry Aircraft Registration Branch

On September 28, 2015, OMB approved continuation of collection 2120-0042 for 18 months through April 30, 2017, with instruction that all forms within the group must be PDF-fillable versions to which the public could apply electronic/digital signatures. At that time, only the AC Form 8050-1 was not available as a fillable PDF document. Though the other forms were available as PDFs, electronic/digital signatures were not acceptable for processing.

In February/March 2016 the Civil Aviation Registry (Registry) Aircraft Registration Branch developed a fillable PDF version of the AC Form 8050-1, with deployment of the form on the FAA forms website taking place on or about May 1, 2016. Thus, all the forms associated with the subject collection were available to the public in fillable PDF format. Until that time, submittal of the AC Form 8050-1 and the AC Form 8050-2, on longstanding advice from General Counsel, had required application of actual <u>ink</u> signatures.

In the spring of 2016, after consultation with General Counsel, the Registry revised their position. Federal Register notice published on April 20, 2016 stated that, effective May 1, 2016, the forms received or recorded by the Aircraft Registration Branch regarding aircraft ownership, registration or liens (forms included in the subject collection) were able to receive a digital/electronic signature and would be accepted by the Registry with the digital/electronic signature(s) applied.

However, the Registry Modernization System (RMS), currently used for Aircraft Registry work processing, has no portal nor capability of receiving electronic forms/documents. They must still be submitted in paper format. Only registration <u>renewal</u> every three years is set up for electronic processing if, and only if, there has been <u>no change in the registrant information</u>. To achieve the electronic renewal process, the aircraft owner utilizes an online code provided to them by the Aircraft Registry in a notice of upcoming expiration. They do not actually complete an electronic form, but upon completion of the online renewal, RMS generates a completed electronic version of the AC Form 8050-1B that it adds to the aircraft record. <u>However</u>, if pertinent address or other information has changed, the owner must complete the AC Form 8050-1B indicating the change of address or other information, apply a signature and submit to the Aircraft Registry…in paper format.

The Registry is, currently and actively, in process of system evaluation and business needs assessment to help formulate requirements for a new system that will allow the receipt and processing of electronic submittals for issuance of aircraft registration and airmen certification products in accordance and compliance with the Government Paperwork Elimination Act. The development and cost of that system will be substantial. As the requirements are, and will be, extremely complex, we do not anticipate, nor believe, that system testing and roll-out will or can occur for several years.