SUPPORTING STATEMENT A
B4UFLY Smartphone App
2120-0764

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

The FAA documented over 2,350 pilot, law enforcement, and private citizen reports of unmanned aircraft 'events' in 2018 This is more than a 900% increase from 2014, during which the FAA received 238 of these reports. This increase in reports, particularly in close proximity to airports, suggests that many unmanned aircraft system (UAS) operators are unaware of safety guidelines and policies and are unaware of the potential hazards these operations may pose to manned aircraft operations.

The risk posed to the National Airspace System (NAS) by increasingly unsafe UAS operations makes the future of a successful integration of drones into the National Airspace (NAS) dependent upon a strong foundation of safety. This means giving pilots the information they need in a precise, reliable and concise format with consistent up-to-date safety information. There is a need to continue providing recreational drone operators with an easy-to-use safety awareness product with situational awareness of the airspace where they can fly safely.

B4UFLY is a FAA Mobile Application for iOS and Android that provides a small Unmanned Aircraft Systems (sUAS) aircraft operator the ability to check their current location for conformance with FAA published guidelines prior to flight operations to Public Law 112-95, Section 336: Part 101 Special Rule for Model Aircraft (FMRA) which outlines what a model aircraft is and how it can be legally operated within the national airspace by providing situational awareness of flight restrictions – including locations of airports, restricted airspace, special use airspaces, and temporary flight restrictions – based on a user's current or planned flight location.

In addition, Public Law 112-95, Section 336 requires model aircraft operators to notify the airport operator and air traffic control tower (if one is located at the airport) prior to operating within 5 miles of an airport. The initial release of the application asked the users to provide answers to questions (When, Where and How High) flights were planned. Currently, there is no established process to facilitate this exchange of information. The B4UFLY app's initial concept included providing phone numbers for users to call air traffic control towers (ACTCs) to fulfill this notification requirement. However, further analysis showed that frequent calls to an ACTC could disrupt normal

tower functions and possibly create a safety risk. The new version due to release Q42019 does not have this collection of data.

Therefore, the FAA has developed a technology-based notification process by giving the pilot a notification that an authorization or waiver is needed to fly near restricted airspace. The application lists a link outside the application to the Low Altitude Authorization Notification Capability (LAANC) allowing the user to apply for and receive immediate permissions (if applicable) to continue to operate. The LAANC system then feeds the known flights into the ACTC maps alerting the control towers of the planned flight. This information is collected under OMB Control number FAA 2120-0768.

In order to maintain NAS safety in proximity to airports, air traffic control personnel would need certain basic information about a UAS operator's intended flight in order to assess whether the UAS may disrupt or endanger manned air traffic. Users will not be able to fulfill the statutory requirement for notification using the current versions of B4UFLY however, they will be shown a warning message interactive within the application that they must apply for an authorization to fly. The B4UFLY app will provide a link that directs the user to a website outside of the application to begin that authorization request.

All flight restriction data populated from back-end database is non-PII. There will be no information collected by the B4UFLY application of user's flight plans or authorization requests.

Currently the application collects voluntary information of When, Where and How High the UAS pilot will fly as well as a Contact Us weblink to the FAA.Gov UASHELP desk for technical and policy questions. The 'Contact FAA' link to the FAA.gov feedback web-form is where individuals may provide comments, questions, or issues they may have regarding B4UFLY policy related questions. The newly released version will no longer collect the When, Where and How High after July 31, 2019 but will add an additional Contact Us link specifically for technical questions directly to the development team. The 'Contact Kittyhawk' links to the Typeform web-form is where individuals may provide comments, questions, or issues regarding technical issues with B4UFLY 2.0. Providing an email address on the Typeform web-form is optional for users who require a response from Kittyhawk and no other PII is collected.

2. 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 current release of the application asks the users to provide answers to questions (When, Where and How High) flights were planned. Currently, there is no established

process to facilitate this exchange of information. The current collection of data of questions (When, Where and How High) did not provide useful information as intended and will be discontinued Q42019.

B4UFLY 2.0 will provide two web links so that will allow users to voluntarily provide feedback regarding the operation of the application to the FAA for policy related questions and Kittyhawk for technical related questions. The 'Contact FAA' link to the FAA.gov feedback web-form is where individuals may provide comments, questions, or issues, they may have regarding B4UFLY 2.0 policy related questions.[1] The FAA.gov feedback web-form only requires that individuals provide an email address so that they may be contacted in response to the feedback they provided. Additionally, the 'Contact Kittyhawk' link to the Typeform web-form is where individuals may provide comments, questions, or issues regarding technical issues with B4UFLY 2.0. Providing an email address on the Typeform web-form is optional for users who require a response from Kittyhawk and no other PII is collected.

In our terms of service, the application will state that the B4UFLY application does not maintain, or disseminate any users' personally identifiable information (PII). Please see our Privacy Policy for further information regarding what information may be collected which is not personally identifiable. Users who seek to provide feedback regarding B4UFLY may provide feedback at the FAA.gov website. The user must agree that all user information and information you provide to Kittyhawk or submitted through the B4UFLY application is subject to our Privacy Policy.

The data collected will be used:

1. By the FAA to respond to the UAS pilots who voluntarily provide comments, questions, or issues, they may have regarding B4UFLY 2.0 policy related questions. An email address is collected for response purposes in accordance with Section 336 of the FAA's 2012 Reauthorization
2. By the Kittyhawk development team where individuals may provide comments, questions, or issues regarding technical issues with B4UFLY 2.0. An email address is only required if the pilot requires a response.

3. 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.

This data collection is 100% electronic.

Additionally, the implementation of the B4UFLY app could eventually reduce the burden on any user attempting to fly within 5 miles of multiple airports – rather than having to notify each airport air traffic control tower individually, users will be directed to a site to apply for authorization of flight to provide a single notification that will be routed to all relevant safety personnel within the FAA.

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[1] The B4UFLY 2.0 FAA feedback web-form is available here.

4. 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.

There is no duplication. The FAA does not provide this level of situational awareness in any other mobile apps to the public therefore the collection of email addresses for feedback response is not duplicated by another system.

5. If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.

The implementation of the B4UFLY app should not impact small business. The app is free and although it is designed to provide situational awareness specifically to model aircraft operators, who, by definition, only fly for hobby or recreational purposes, it may also be used by commercial operators as a situational awareness tool. The selection of the Kittyhawk vendor was made through a Request for Information and several vendors were interviewed and rated for overall worthiness.

6. 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.

Without the collection of data the FAA and the Kittyhawk development team will not be able to respond to policy and technical questions in support of the pilots using the application. This could cause the pilot to not have a clear indication of where it is and is not safe ty fly their UAS.

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

There are no special circumstances.

8. Provide information on the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the 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 recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

A Federal Register Notice published on March 14, 2019 (84 FR 9411) solicited public comment. No comments were received in the comment period.

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

No payments or gifts are provided to respondents.

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

No assurance of confidentiality is provided.

11. 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.

There are no questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

The new version of B4UFLY being released late summer 2019 will electronically monitor aggregated, anonymous, and non-identifiable data to monitor the performance and functionality of the application which in the future will give us more current usage data. We will use various technologies (e.g. cookies) to help us improve the application that may include data such as unique device identifiers, IP addresses, hardware models, operating system and version, etc.

To date, more than 650,000 people have downloaded the application. Since these operators are specifically hobby or recreational flyers, and the B4UFLY app was developed specifically for hobby or recreational flight, we are comfortable with a benchmark estimate that perhaps a half of them (360,000) will eventually utilize the B4UFLY application. Since 2015, the application has received only 340 helpdesk tickets.

1. Responding to the collection of data of questions (When, Where and How High) typically requires no longer than 90-120 seconds (approximately 0.025-0.033 hours) per respondent per submission.

   The Department used the mean hourly wage rate for private sector Service

Provider.[2] These hourly wage rates include benefits. The Department adjusted the 2016 wages to 2018 dollars, and then increased them by 50 percent to account for overhead costs such as rent, utilities, and office equipment.[3] Based on past submission to the collection the annualized number of responses is 340. The time to submit collection results in no more than .033 per collection hours and 11.22 annually to submit collection.   Based on hourly wage of a service-providing civilian of $35.77 hourly wage plus overhead and fringe benefits costs of $35.77 per hour which costs the user is $2.36 per submission.

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents	340		0
# of Responses per respondent	1		0
Time per Response	.033 hours		0
Total # of responses	340		0
Total burden (hours)	11.22		0

2. Submitting a policy question through the FAA "Contact Us" typically requires no longer than 90-120 seconds (approximately 0.025-0.033 hours) per respondent per submission.

   The Department used the mean hourly wage rate for private sector Service Provider.[4] These hourly wage rates include benefits. The Department adjusted the 2016 wages to 2018 dollars, and then increased them by 50 percent to

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[2] Source: XXXX Department of Commerce, "2016 XXXX Prevailing Wage and Workforce Assessment Study," http://website.gov The wage rates used here "include all applicable fringe benefits."

[3] Source: Cody Rice, U.S. Environmental Protection Agency, "Wage Rates for Economic Analyses of the Toxics Release Inventory Program" (June 10, 2002), https://www.regulations.gov/document?D=EPA-HQ-OPPT-2014-0650-0005.

[4] Source: XXXX Department of Commerce, "2016 XXXX Prevailing Wage and Workforce Assessment Study," http://website.gov The wage rates used here "include all applicable fringe benefits."

account for overhead costs such as rent, utilities, and office equipment.[5] Based on past submission to the collection annualized, there were no more than .033 hours annually to submit collection.   Based on hourly wage of a service providing civilian of $35.77 hourly wage plus overhead and fringe benefits costs of $35.77 per hour which costs the user is $2.36 per submission.

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents	57		0
# of Responses per respondent	1		0
Time per Response	.033		0
Total # of responses	57		0
Total burden (hours)	1.88		0

Submitting a technical question through the Kittyhawk "Contact Us" typically requires no longer than 90-120 seconds (approximately 0.025-0.033 hours) per respondent per submission.

The Department used the mean hourly wage rate for private sector Service Provider.[6] These hourly wage rates include benefits. The Department adjusted the 2016 wages to 2018 dollars, and then increased them by 50 percent to account for overhead costs such as rent, utilities, and office equipment.[7] Based on past submission to the collection annualized, there were no more than .033 hours annually to submit collection.   Based on hourly wage of a service providing civilian of $35.77 hourly wage plus fringe benefits costs of $35.77 per hour which costs the user is $2.36 per submission.

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure

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[5] Source: Cody Rice, U.S. Environmental Protection Agency, "Wage Rates for Economic Analyses of the Toxics Release Inventory Program" (June 10, 2002), https://www.regulations.gov/document?D=EPA-HQ-OPPT-2014-0650-0005.

[6] Source: XXXX Department of Commerce, "2016 XXXX Prevailing Wage and Workforce Assessment Study," http://website.gov The wage rates used here "include all applicable fringe benefits."

[7] Source: Cody Rice, U.S. Environmental Protection Agency, "Wage Rates for Economic Analyses of the Toxics Release Inventory Program" (June 10, 2002), https://www.regulations.gov/document?D=EPA-HQ-OPPT-2014-0650-0005.

# of Respondents	57		0
# of Responses per respondent	1		0
Time per Response	.033		0
Total # of responses	57		0
Total burden (hours)	1.88		0

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information.

There are no material costs to respondents

14. Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, 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.

The Department used the mean hourly wage rate for private sector Management, Professional and related.[8] These hourly wage rates include benefits. The Department adjusted the 2016 wages to 2018 dollars, and then increased them by 60 percent to account for overhead costs such as rent, utilities, and office equipment.[9]

Based on past reported helpdesk tickets annualized, there were no more than 4 hours annually to support the public requests. The annual cost to the government is $485.60 to respond to comments. Total annualized helpdesk tickets of 114 at the rate of $60.70 plus overhead and fringe benefits of $60.70 hourly is accounted for.

15. Explain the reasons for any program changes or adjustments.

The information being collected through the application is changing. Previously, the app

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[8] Source: XXXX Department of Commerce, "2016 XXXX Prevailing Wage and Workforce Assessment Study," http://website.gov The wage rates used here "include all applicable fringe benefits."

[9] Source: Cody Rice, U.S. Environmental Protection Agency, "Wage Rates for Economic Analyses of the Toxics Release Inventory Program" (June 10, 2002), https://www.regulations.gov/document?D=EPA-HQ-OPPT-2014-0650-0005.

asked the users to provide answers to questions (When, Where and How High) flights were planned. Currently, there is no established process to facilitate this exchange of information and is therefore being discontinued and will no longer be collected after July 31, 2019.

Additionally, the ability to contact the FAA directly through a Contact Us link allows the FAA to rapidly respond to policy based regulatory questions. Adding a direct Contact Us link directly to the development team, allows the pilot to receive quicker responses to technical issues especially on holidays and weekends when the FAA helpdesk is not operational.

Ending the collection of the When, Where, How High information, and only collecting information through the Contact Us links, results in fewer respondents and therefore less burden on the public.

16. 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.

The information is not published.

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

B4UFLY is not seeking approval to not display the expiration date.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

There are no exceptions.