

Federal Aviation Administration

SUPPORTING STATEMENT

Waivers and ATC Authorization in Controlled Airspace under Part 107

2120-0768

INTRODUCTION

This Information Collection is submitted to the Office of Management and Budget (OMB) to request renewal of an existing Information Collection currently authorized under Information Collection 2120-0768, “Waivers and ATC Authorization in Controlled Airspace under Part 107.” The request will allow the Federal Aviation Administration (FAA) to leverage automated means of collecting and processing airspace authorizations, airspace waivers, and operational waivers requested pursuant to 14 C.F.R. Part 107.

Part A. Justification

1. Circumstances that make collection of information necessary.

Congress directed the Secretary of Transportation to determine which types of unmanned aircraft systems (UAS) may operate safely in the national airspace system (NAS) (See 49 U.S.C. § 44807). Based on such determinations, the FAA established requirements for the safe operation of UAS in the NAS.

Based on its consideration of the comments submitted in response to the notice of proposed rulemaking entitled Operation and Certification of Small Unmanned Aircraft Systems (80 FR 9544, February 23, 2015), and its experience with the certification, exemption, and Certificate of Waiver or Authorization process, the FAA issued the Operation and Certification of Small Unmanned Aircraft Systems final rule to enable certain small UAS operations to commence and accommodate technologies as they evolve and mature (81 FR 42064, June 28, 2016). This final rule is contained in Title 14 C.F.R. § 107.1, et seq.

Title 14 C.F.R. § 107.41 states:

No person may operate a small unmanned aircraft in Class B, Class C, or Class D airspace or within the lateral boundaries of the surface area of Class E airspace designated for an airport unless that person has prior authorization from Air Traffic Control (ATC).

Part 107 provides that the FAA may issue certificates of waiver that authorize certain operations that do not fulfill the requirements of Part 107. Title 14 C.F.R. § 107.200(a) provides:

The Administrator may issue a certificate of waiver authorizing a deviation from any regulation specified in § 107.205 if the Administrator finds that a proposed small UAS operation can safely be conducted under the terms of that certificate of waiver.

Section 107.41 (Operation in certain airspace) is subject to waiver. Waivers of §107.41 are referred to throughout this document as “airspace waivers”; waivers of the other provisions listed

in §107.205 are referred to as “operational waivers.” The FAA submitted the previously approved Information Collection 2120-0768 to implement the requirements of Part 107 and allow respondents to request airspace authorizations, airspace waivers, and operational waivers to operate small UAS in controlled airspace. Flight operations conducted pursuant to 14 C.F.R. Part 107 are referred to as Part 107 operations.

Part 107 Airspace Authorizations

Part 107 airspace authorization requests under Information Collection 2120-0768 can be submitted via the Low Altitude Authorization and Notification Capability (LAANC) or through the FAA’s web portal.

Low Altitude Authorization and Notification Capability (LAANC)

LAANC is a tool provided by the FAA and UAS Service Suppliers (USSs) to Part 107 respondents to process requests for authorization to conduct Part 107 operations in controlled airspace. USSs are FAA-approved industry partners. The USSs, in a private-public partnership with the FAA, act as a conduit between Part 107 respondents and the FAA to facilitate the request process. Using LAANC, a Part 107 respondent submits a request for authorization to operate a small UAS in a particular airspace location to the USS. The USS collects information regarding the date, time, and location of the proposed operation and processes the request to the FAA. A response is provided by FAA through the USS to the Part 107 respondent advising whether the request for authorization is approved or denied.

The information requested from a Part 107 respondent is the minimal amount of information necessary for the FAA to know where, when, and for how long an operation will occur. This information is necessary and essential to ensure the safe operation of small UAS in the NAS.

Web Portal

The web portal is an enterprise IT solution developed to consolidate several small UAS support systems¹ into a central location. Respondents will establish a single account on the web portal where they will be able to conduct multiple activities, including requesting authorization to fly pursuant to 14 C.F.R. § 107.41. Respondents communicate directly with the FAA when using the web portal. When a respondent requests an authorization to fly via the web portal, the FAA will manually process the request and provide an approval or denial to the respondent via the web portal. The information requested from a Part 107 respondent is the minimal amount of information necessary for the FAA to know where, when, and for how long an operation will occur. This information is necessary and essential to ensure the safe operation of small UAS in the NAS.

Part 107 Airspace Waivers

Web Portal

Under 14 C.F.R. § 107.205(h), Part 107 operators may request a waiver to the authorization requirements of § 107.41 or “airspace waiver”. Respondents may use the web portal, which is the enterprise IT solution developed to consolidate several small UAS support systems² into a

¹ Airspace Waivers and Operational Waivers are included in these systems and are addressed in separate sections.

² Part 107 Authorizations and Operational Waivers are included in these systems and are addressed in separate

central location, to request airspace waivers. Respondents communicate directly with the FAA when using the web portal. When a respondent requests an airspace waiver via the web portal, the FAA will manually process the request and provide an approval or denial to the respondent via the web portal. The information requested from a respondent is the minimal amount of information necessary for the FAA to know where, when, and for how long an operation will occur. This information is necessary and essential to ensure the safe operation of small UAS in the NAS.

Part 107 Operational Waivers

Web Portal

Under 14 C.F.R. § 107.205, several operational restrictions codified in Part 107 may be waived. These waivers, which are referred to as “operational waivers”, may also be requested via the web portal. Through the web portal, respondents will establish a single account where they will be able to conduct multiple activities, including requesting operational waivers pursuant to § 107.205. Part 107 respondents communicate directly with the FAA when using the web portal. When a respondent requests an operational waiver, the FAA will manually process the request and provide an approval or denial to the respondent via the web portal.

A waiver of any of the sections listed in § 107.205 constitutes an operational waiver except for a waiver of § 107.41 which constitutes an airspace waiver. To the extent a respondent seeks an operational waiver, the respondent will, via the web portal, provide the information required to make a safety determination, including the manner he or she will ensure the safety of the operation by mitigating any risks the operation presents. After an initial review, the FAA may also require the respondent submit additional information in support of his or her application. The respondent will be notified of approval or denial of requests for operational waivers via the web portal.

2. How, by whom, and for what purpose is the information used.

Respondents are small UAS operators seeking to fly small UAS in controlled airspace under 14 CFR Part 107. Per the regulatory requirements of § 107.41, no person may operate a small unmanned aircraft in Class B, Class C, or Class D airspace or within the lateral boundaries of the surface area of Class E airspace designated for an airport unless that person has prior authorization from Air Traffic Control (ATC). Thus, respondents are required to provide certain information to ATC as part of the application process to gain authorization to fly in controlled airspace. The information includes the respondent’s name, telephone number, email address, and information related to the date, time, place, and altitude of any planned flight operations in controlled airspace. Reporting this information is required for Part 107 operators to receive authorization to fly a small UAS in controlled airspace. There are no record-keeping or disclosure requirements.

The information requested from respondents for all three categories (Part 107 airspace authorizations, airspace waivers, and operational waivers) is essential to the FAA’s mission of ensuring safety in the airspace. The FAA is tasked with the exclusive management of airspace in

sections.

the United States and must issue regulations and control the use of airspace to ensure the safe and efficient use of airspace.³

Part 107 Airspace Authorizations

The FAA uses the information provided by respondents via either LAANC or the web portal for the same purposes and will address each together.

LAANC and Web Portal

To accomplish the FAA's mandate of providing safe and efficient use of airspace, FAA's Air Traffic Control must be aware of any planned operations of small UAS in controlled airspace. Small UAS operating in controlled airspace will be entering airspace potentially occupied by a variety of other aviation vehicles. FAA's Air Traffic Control must provide authorization of planned small UAS operations prior to them occurring to ensure that the operations will not interfere with other air traffic.

The information provided by respondents to request authorization to conduct Part 107 operations, whether through LAANC or via the web portal, is used by the FAA to provide (or deny) authorization to conduct a Part 107 operation consistent with the FAA's legal mandate to maintain a safe and efficient airspace.

Part 107 Airspace Waivers

Web Portal

The FAA uses information respondents submit via the web portal to determine whether each respondent can safely operate the small UAS under the terms of an airspace waiver that authorizes deviation from § 107.41. The FAA reviews and analyzes the information it collects from the respondent to determine the type and extent of the intended deviation from § 107.41. In general, the FAA will issue a certificate of waiver or authorization to the respondent (individuals and businesses) if the proposed operation does not create a hazard to persons on the ground or to other aircraft.

If the FAA did not collect this information, the FAA would not be able to grant certificates of waiver from § 107.41 as the FAA uses the information to authorize (or deny) the requested airspace waiver consistent with the FAA's legal mandate to maintain a safe and efficient airspace.

Part 107 Operational Waivers

Web Portal

The FAA uses information respondents submit via the web portal to determine whether each respondent can safely operate the small UAS under the terms of a waiver that authorizes deviation from specific provisions of Part 107. The FAA reviews and analyzes the information it collects from each respondent to determine the type and extent of the intended deviation from Part 107's prescribed regulations. In general, the FAA will issue a certificate of waiver or authorization to the respondent (individuals and businesses) if the proposed operation does not create a hazard to persons on the ground or to other aircraft.

If the FAA did not collect this information, the FAA would not be able to grant certificates of waiver from the operational regulations listed in § 107.205 as the FAA uses the information to

³ See 49 U.S.C. §§ 40103 and 44701; 49 U.S.C. § 44807

authorize (or deny) the requested operational waiver consistent with the FAA's legal mandate to maintain a safe and efficient airspace.

3. Extent of automated information collection.

Part 107 Airspace Authorizations

Airspace authorizations are requested via LAANC and the web portal. Each possesses different degrees of automation. Submissions are made electronically under both systems. The FAA has chosen to use LAANC and the web portal to process airspace authorization requests from small UAS operators because by automating the process and proving an electronic manner of compliance, the FAA is making the process less burdensome and more efficient for the respondents.

LAANC

LAANC is a highly automated system that provides near real time authorizations. All information for requests for airspace authorization that fall within the UAS Facility Map altitudes, including the submission, processing, and response to the respondent is automated.

Web Portal

The web portal is partially automated. The submission of a request and response from FAA is automated; processing requires human analysis conducted by the FAA.

Part 107 Airspace Waivers

Web Portal

Requests for Part 107 airspace waivers are collected via the web portal. The web portal is partially automated. The submission of a request and response from FAA is automated, but the review of each request the FAA receives via the web portal requires individual analysis that the FAA conducts.

Part 107 Operational Waivers

Web Portal

Requests for Part 107 operational waivers are collected via the web portal. The web portal is partially automated. The submission of a request and response from FAA is automated, but the review of each request the FAA receives via the web portal requires individual analysis that the FAA conducts.

4. Efforts to identify duplication.

Part 107 Airspace Authorizations

LAANC

The FAA is the only government entity that collects or requests information from respondents related to requests for authorization to conduct Part 107 operations in class B, C, D, or within the lateral boundaries of the surface area of class E airspace adjacent to an airport. Duplicate records for the same authorization request could exist if an operator voluntarily chooses to use the web portal and LAANC for the same operation. The requested information will be stored in the shared LAANC and web portal data repository. The information is not located in any other Federal data repository nor accessible in other government systems

Web Portal

The FAA is the only government entity that collects or requests information from respondents related to requests for authorization to conduct Part 107 operations in class B, C, D, or within the lateral boundaries of the surface area of class E airspace adjacent to an airport. Duplicate records for the same authorization request could exist if an operator voluntarily chooses to use the web portal and LAANC for the same operation. The requested information will be stored in the shared LAANC and web portal data repository. The information is not located in any other Federal data repository nor accessible in other government systems.

Part 107 Airspace Waivers

Web Portal

The FAA is the only government entity that collects or requests information from respondents related to requests for waivers from § 107.41. The requested information will be stored in the shared LAANC and web portal data repository. The information is not located in any other Federal data repository nor accessible in other government systems.

Part 107 Operational Waivers

Web Portal

The FAA is the only government entity that collects or requests information from respondents related to requests for waivers to regulations listed in § 107.205. The requested information will be stored in the shared LAANC and web portal data repository. The information is not located in any other Federal data repository nor accessible in other government systems.

5. Efforts to minimize the burden on small businesses.

Part 107 Airspace Authorizations

LAANC

The requested information is limited to the minimum information needed for the FAA to approve or deny a requested Part 107 airspace authorization. The FAA is legally mandated to maintain a safe and efficient airspace. No exception can be provided to any respondent, including small businesses, from providing the requested information as it is essential to maintaining a safe airspace. LAANC is an alternative method to request airspace authorizations from the web portal and is expected to take significantly less time for small businesses to request and receive authorization to conduct Part 107 operations, thereby greatly reducing the burden on small businesses.

Web Portal

The requested information is limited to the minimum information needed for the FAA to approve or deny a requested Part 107 airspace authorization. The FAA is legally mandated to maintain a safe and efficient airspace. No exception can be provided to any respondent, including small businesses, from providing the requested information as it is essential to maintaining a safe airspace.

Part 107 Airspace Waivers

Web Portal

The requested information is limited to the minimum information related to the requested waiver from § 107.41 necessary to ensure the safe and efficient maintenance of the NAS. The FAA has ensured that no information other than that necessary to maintain a safe airspace has been requested. No exception can be provided to any Part 107 operator, including small businesses, from providing the requested information as the information is essential to maintaining safe airspace. If the respondent does not provide sufficient information to enable the FAA to approve or deny the request, the FAA will contact the respondent and request additional information.

Part 107 Operational Waivers

Web Portal

The requested information is limited to the minimum information related to the requested waiver from the regulations listed in § 107.205 necessary to ensure the safe and efficient maintenance of the NAS. The FAA has ensured that no information other than that necessary to maintain a safe airspace has been requested. No exception can be provided to any Part 107 operator, including small businesses, from providing the requested information as the information is essential to ensuring operations meet an equivalent level of safety. If the respondent does not provide sufficient information to enable the FAA to approve or deny the request, the FAA will contact the respondent and request additional information.

6. Impact of less frequent collection of information.

Part 107 Airspace Authorizations

The FAA has a statutory mandate to control and maintain a consistently high level of civil aviation safety. The information requested for Part 107 airspace authorizations is necessary to ensure that each unique operation will be conducted safely. Without the information requested from respondents, the FAA would be unable to approve any airspace authorizations submitted under Part 107.

Part 107 Airspace Waivers

The FAA has a statutory mandate to control and maintain a consistently high level of civil aviation safety. The information collections for airspace waivers are necessary to ensure that each unique operation will be conducted safely. Without the information requested from respondents, the FAA would be unable to approve any airspace waivers submitted under Part 107.

Part 107 Operational Waivers

The FAA has a statutory mandate to control and maintain a consistently high level of civil aviation safety. The information collections for operational waivers are necessary to ensure that each unique operation will be conducted safely. Without the information requested from respondents, the FAA would be unable to approve any operational waivers submitted under Part 107.

7. Special circumstances.

There are no special circumstances for this information collection.

8. Compliance with 5 CFR 1320.8.

A Federal Register Notice published on August 7, 2019 (84 FR 38719) solicited public comment. No comments were received.

9. Payments or gifts to respondents.

No gifts or payments are provided to respondents.

10. Assurance of confidentiality

There is no assurance of confidentiality provided to respondents.

11. Justification for collection of sensitive information.

Part 107 Airspace Authorizations

The only information collected that may be considered “sensitive in nature” is the personal information associated with the Part 107 operation (aircraft operator name, telephone number, email address, and optionally provided registration number). This personal information is limited to what is necessary for the FAA to contact Part 107 operators in the event of a hazardous condition or if any other situation arises that requires a Part 107 operator to cease the flight operation. Any records collected containing personally identifiable information are covered by the Privacy Act and will be managed in accordance with the Department of Transportation system of records notice (SORN) DOT/FAA 854 – Small Unmanned Aircraft Systems (sUAS) Waivers and Authorizations (84 FR 32512, Aug. 7, 2019). LAANC’s Privacy Impact Assessment was completed on June 21, 2019.⁴ The web portal’s Privacy Impact Assessment was completed on June 27, 2016.⁵

Part 107 Airspace Waivers

The only information collected that may be considered “sensitive in nature” is the personal information associated with the Part 107 operation (aircraft operator name, telephone number, email address, and optionally provided registration number). This personal information is limited to what is necessary for the FAA to contact Part 107 operators in the event of a hazardous condition or if any other situation arises that requires a Part 107 operator to cease the flight operation. The Department of Transportation system of records notice (SORN) DOT/FAA 854 - Small Unmanned Aircraft Systems (sUAS) Waivers and Authorizations (84 FR 32512, July 8, 2019), explains the scope of the information the FAA collects, how the agency protects the information, and other aspects of the information collection and retention. The web portal’s Privacy Impact Assessment was completed on June 27, 2016.

⁴ <https://www.transportation.gov/individuals/privacy/low-altitude-authorization-and-notification-capability-laanc-privacy-impact>

⁵ <https://www.transportation.gov/sites/dot.gov/files/docs/Privacy%20-%20FAA%20-%20sUAS%20Rulemaking%20-%20PIA%20-%20Adjudicated%20-%20062716.pdf>

Part 107 Operational Waivers

Web Portal

The only information collected that may be considered “sensitive in nature” is the personal information associated with the Part 107 operation (aircraft operator name, telephone number, email address, and optionally provided registration number). This personal information is limited to what is necessary for the FAA to contact Part 107 operators. Any records collected are covered by the Privacy Act and will be managed in accordance with the Department of Transportation system of records notice (SORN) DOT/FAA 854 – Small Unmanned Aircraft Systems (sUAS) Waivers and Authorizations (84 FR 32512, July 8, 2019). The web portal’s Privacy Impact Assessment was completed on June 27, 2016

12. Estimate of burden hours for information requested.

Part 107 Airspace Authorizations

Respondents can submit Part 107 airspace authorization requests through either the web portal or through LAANC.

As of September 30, 2019, there were 408,004 small UAS registered under Part 107. As of September 30, 2019, the FAA had received 115,057 requests for authorization to fly small UAS under Part 107 in 2019. Of these requests, 101,474 (or 88%) were sent through LAANC and 13,583 (or 12%) were sent through the web portal. With a fleet of 408,004 Part 107 small UAS, this results in a ratio of .36 authorization requests per small UAS Part 107 registration per year. At the current rate of authorization requests, the FAA estimates that it will receive 153,409 authorization requests in 2019. The FAA Aerospace Forecast for Fiscal Years 2019-2039⁶ projects an increase in the size of the Part 107 small UAS fleet of 36.25% from 2019 to 2020, 30.46% from 2020 to 2021, and 10.97% from 2021 to 2022. Given the growth rate projection in the FAA Aerospace Forecast and the rate of registrations that occurred in 2019, the FAA estimates that there will be 588,443 Part 107 small UAS in 2020, 767,683 in 2021, and 851,898 in 2022.

LAANC initially launched in October 2017 at ten prototype sites and was rolled out nationally throughout 2018. In 2019, even more sites have been added and that is expected to continue into the future. As of September 30, 2019, there have been 177,265 total airspace authorization requests submitted to the FAA. 151,625 (or 85.5%) of those through LAANC and 25,640 (or 14.5%) through the web portal. The percentage of requests made through LAANC vs. the web portal has increased over time. Though the FAA expects more Part 107 operators to use LAANC as it is introduced to more sites, to be conservative in its burden estimate on the public, the FAA will apply the current 2019 ratio of 88% of authorization requests through LAANC and 12% through the web portal to determine future distribution of authorization requests. The FAA estimates that a respondent will require 5 minutes (or .08 hours) to complete an authorization request using LAANC and 30 minutes (or .5 hours) using the web portal. See Table 1, below, for

⁶ https://www.faa.gov/data_research/aviation/aerospace_forecasts/media/FY2019-39_FAA_Aerospace_Forecast.pdf

an estimated calculation on the burden hours on respondents requesting Part 107 airspace authorizations.

Table 1. Burden on Respondents using Web Portal and LAANC.

Period	Respondents	LAANC Submissions	Web Portal Submissions	Burden (hours)
Year 1 (2020)	211,839	211,839(.88) = 186,418	211,839(.12) = 25,421	186,418(.083) + 25,421(.5) = 28,184 hours
Year 2 (2021)	276,366	276,366(.88) = 243,202	276,366(.12) = 33,164	243,202(.083) + 33,164(.5) = 36,768 hours
Year 3 (2022)	306,683	306,683(.88) = 269,881	306,683(.12) = 36,802	269,881(.083) + 36,802(.5) = 40,801 hours
Total	794,888	794,888(.88) = 699,501	794,888(.12) = 95,387	699,501(.083) + 95,387(.5) = 105,753 hours
Annual Average	264,963	233,167	31,796	35,251 hours

Respondents must use an appropriate web-capable electronic device (e.g., computer or smart phone) to request authorization via the web portal or LAANC. The FAA estimates that the annual burden hours on respondents will be 35,251 (19,353 for LAANC respondents and 15,898 for web portal respondents). The FAA calculates the average wage of respondents to be \$42.49/hour. This number is based on the average wage across all occupations as outlined in the U.S. Bureau of Labor Statistics “Employer Costs for Employee Compensation – December 2018⁷”, which calculates the average wage at \$36.32 across all occupations. This wage includes fringe benefits, but not costs for overhead. The FAA increased the hourly wage by 17 percent to account for overhead costs such as rent, utilities, and office equipment⁸ for a total wage of \$42.49. Based on the annual estimate of 35,251 hours, the total cost will be \$1,497,814.29 (\$822,308.97 LAANC respondents and \$675,506.02 for web portal respondents).

Part 107 Airspace Waivers

⁷ See, <https://www.bls.gov/news.release/pdf/ecec.pdf>

⁸ 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>

From January 1, 2019 – September 30, 2019, the FAA received 1,742 applications for airspace waivers, which is less than the 3,638 applications received in 2018. At the current rate, the FAA would receive a total of 2,323 applications for calendar year 2019. It is likely that the number of airspace waiver applications has dropped due to the availability of airspace authorizations through LAANC. As the LAANC program expands, the FAA does anticipate continuing to see a drop in the number of airspace waiver applications. However, to be conservative, the FAA will apply an estimate growth rate of 10% for airspace waiver applications. FAA will use this growth rate due to the overall expected rise in UAS usage and that the historical record is still recent and the trends are not completely established. Using this estimated annual growth rate, there would be 2,555 applications in 2020, 2,811 applications in 2021, and 3,092 in 2022. The FAA estimates that completing the airspace waiver application form using the web portal takes 30 minutes (or .5 hours) per application. See Table 2 below for estimated calculation of the total burden on respondents from 2020-2022 while using the web portal.

Table 2. Burden on Respondents Submitting Airspace Waivers using Web Portal

Period	Airspace Waiver Respondents	Burden (hours)
2020	2,555	2,555(.5) = 1,278 hours
2021	2,811	2811(.5) = 1,405 hours
2022	3,092	3,092(.5) = 1,546 hours
Total	8,458	8,458(.5) = 4,229 hours
Annual	2,819	1,410 hours

Based on the average was of \$42.49 per hour as described above in the Airspace Authorization section and annual average burden hours of 2,819, the FAA calculate the annual cost to respondents submitting airspace waivers to be \$119,779.31

Part 107 Operational Waivers

From January 1, 2019 – September 30, 2019, the FAA received 4,965 applications for operational waivers. At the current rate, the FAA would receive a total of 6,620 applications for calendar year 2019. This is a decrease from the number of applications received in 2018 (7,109). However, given the growth of UAS and to be conservative, the FAA will apply an estimate growth rate of 10% for operational waiver applications. FAA will use this growth rate due to the overall expected rise in UAS usage and that the historical record is still recent and the trends are not completely established. Using this estimated annual growth rate, the FAA estimates there will be 7,282 applications in 2020, 8,010 in 2021, and 8,811 in 2022. The FAA estimates that completing the operational waiver application form using the web portal will take 30 minutes (or .5 hours) per application. However, since the average respondent submits 1.3 waiver applications, the resulting average burden is 0.65 hour per respondent. See below Table 3 for a

calculation of the total burden on respondents from 2020-2022 and the average annual burden while using the web portal.

Table 3. Burden on Respondents Submitting Operational Waivers Using Web Portal.

Period	Respondents	Burden (hours)
2020	7,282	$7,282(.65) = 4,733$ hours
2021	8,010	$8,010(.65) = 5,207$ hours
2022	8,811	$6,609(.65) = 5,727$ hours
Total	24,103	$24,103(.65) = 15,667$ hours
Annual	8,034	5,222

Based on the average was of \$42.49 per hour as described above in the Airspace Authorization section and annual average burden hours of 5,222, the FAA calculates the annual cost to respondents submitting operational waivers to be \$221,882.78

13. Estimate of total annual costs to respondents.

Part 107 Airspace Authorizations

LAANC

The FAA assesses no charge to respondents who request authorizations using LAANC. An individual USS may assess a fee to a respondent to submit a Part 107 operation request through its individual service. This is determined by the USS provider. Since LAANC was launched on October 23, 2017, no USS has levied a fee to respondents.

Web Portal

There is no fee to respondents to use the web portal to request Part 107 authorizations.

Part 107 Airspace Waivers

Web Portal

There is no fee to respondents to use the web portal to request airspace waivers.

Part 107 Operational Waivers

Web Portal

There is no fee to respondents to use the web portal to request operational waivers.

14. Estimate of cost to the Federal government.

Part 107 Airspace Authorizations

LAANC and the web portal share resources and the costs of running these programs are intertwined between them. This sharing of resources allows the FAA to save money on cloud hosting fees and other sustainment costs. Additionally, the development of LAANC should result in reduced number of contractors evaluating authorization requests submitted via the web portal. The following costs have been broken out according to (1) system sustainment and maintenance and (2) personnel costs.

System Sustainment and Maintenance

The estimated cost of system sustainment and maintenance for both systems is captured in Table 4.

Table 4. Estimated System Sustainment and Maintenance Costs

	2020	2021	2022
Web Portal Sustainment	\$1,450,000	\$1,479,000	\$1,499,706
LAANC Sustainment	\$2,300,000	\$2,800,000	\$3,300,000
Total	\$3,750,000	\$4,279,000	\$4,799,706

Personnel Costs

The FAA currently employs eight contractors and two federal employees to process Part 107 authorization request from respondents. As LAANC is rolled out at more sites nationally in 2018-2020, the FAA expects the number of contractors used to process Part 107 authorization requests will decrease.

The cost for contractors is \$267,688.90 per year and is expected to increase at 2% per year. . The cost for federal employees in 2019 will be \$131,687.17 and a 1.4% annual increase will be applied per the Office of Personnel's Salary Table for each subsequent year. See Table 5 for a calculation of these costs.

Table 5. Cost of Contractors and Federal Employees to Process Part 107 Airspace Authorization Requests.

ATO	2020	2021	2022	Total
Contractors	8 contractors x \$273,042.68 = \$2,184,341.44	6 contractors x \$278,503.53 = \$1,671,021.18	4 contractors x \$284,073.60 =\$1,136,294.40	\$4,991,657.02
Federal Employees	2 employees x \$133,530.79= \$267,061.58	2 employees \$135,400.22= \$270,800.44	2 employees \$137,295.82= \$274,591.64	\$812,453.66
Total	\$2,451,403.02	\$1,941,821.62	\$1,410,886.04	\$5,804,110.68

Part 107 Airspace and Operational Waivers

The following costs have been broken out according to (1) system sustainment and maintenance and (2) personnel costs. The costs for Airspace and Operational Waivers are combined here to reflect that the web portal uses the same group of employees and system.

System Sustainment and Maintenance

The system sustainment and maintenance costs for Part 107 airspace and operational waivers are captured in Table 4.

Personnel Costs

The FAA currently employs nine contractors and six federal employees to process Part 107 airspace and operational waiver applications. The FAA expects that number to remain consistent for 2020-2022. The cost for contractors is \$267,688.90 per year in 2019 and is expected to increase at 2% per year. The cost for federal employees in 2019 will be \$131,687.17 and a 1.4% annual increase will be applied per the Office of Personnel’s Salary Table for 2019. See Table 6 below for a summary of estimated costs.

Table 6. Cost of Contractors and Federal Employees to Process Part 107 Airspace and Operational Waivers

AFS	2020	2021	2022	Total
Contractors	9 contractors x \$273,042.68 = \$2,457,384.12	9 contractors x \$278,503.53 = \$2,506,531.77	9 contractors x \$284,073.60 = \$2,556,662.40	\$7,520,578.29
Federal Employees	6 employees x \$133,530.79 = \$801,184.74	4 employees \$135,400.22= \$541,600.88	4 employees \$137,295.82= \$549,183.28	\$1,891,968.90
Total	\$3,258,568.86	\$3,048,132.65	\$3,105,845.68	\$9,412,547.19

15. Explanation of program changes or adjustments.

Information Collection 2120-0768 was approved on November 23, 2018 for 19,353 hours.

Each of the collection activities under 2120-0768 (airspace authorizations, airspace waivers, and operational waivers) are relatively new activities to the FAA and to the Part 107 respondents. Prior to 2016 there was no UAS regulation in place regarding flights in controlled airspace. Therefore, the FAA has had limited historical data on which to base its previous estimated burden on respondents. The data received during 2019 has established that UAS growth is higher than was expected and the number of total Part 107 respondents is growing. For example, when last submitted to OIRA for approval, the FAA Aerospace Forecast forecasted that there would be 229,000 Part 107 UAS registered by the end of 2019. There are currently over 400,000 Part 107 UAS registered with the FAA.

The FAA now has more data on which to base its estimate and the data shows that the total number of burden hours on the public will increase for both airspace authorizations and operational waivers. The number of requests for airspace waivers has decreased, which is likely related to the expansion of LAANC and easier ability to get airspace authorizations. Although, the total amount of burden has increased due to the increased number of respondents, the burden on individual respondents to make airspace access requests has remained the same.

Part 107 Airspace Authorizations

LAANC

In its most recent request, the FAA requested 12,519 burden hours (or 4,173 average annually) for Part 107 airspace authorizations using LAANC. The number of small UAS is expected to continue to grow so the burden on the public has increased. Based on actual usage through September 2019 and the expected growth rate in small UAS from 2020-2022, the FAA is requesting an additional 45,540 (or 15,180 hours annually) for respondents using LAANC.

Web Portal

In its most recent request, the FAA requested 23,325 (or 7,775 average annually) burden hours for Part 107 airspace authorizations using the web portal. As discussed above, the number of small UAS is expected to continue to grow so the total burden on the public has increased. Based on actual usage through September 2019 and the expected growth rate in small UAS from 2020-2022, the FAA is requesting an increase of 24,369 hours (or 8,123 average annually) for the hours that respondents will spend using the web portal.

Part 107 Airspace Waivers

Web Portal

In its most recent request, the FAA requested 12,360 burden hours (or 4,120 hours average annually) for respondents requesting airspace waivers using the web portal. As LAANC has expanded the number of requests for airspace waivers has decreased. Therefore, the FAA estimates a decrease in the total burden to respondents submitting airspace waivers. Based on actual usage through September 2019 and the expected growth rate in small UAS from 2020-2022, the FAA estimates respondents will see a decrease of 3,902 burden hours (or 1,301 average annually) burden hours when using the web portal to request airspace waivers.

Part 107 Operational Waivers

Web Portal

In its most recent request, the FAA requested 9,858 (or 3,286 average annually) burden hours for respondents requesting operational waivers using the web portal. The number of requests for operational waivers has increased in the past year and given the expected growth in small UAS the FAA estimates the future use will also increase. Based on actual usage through September 2019 and the expected growth rate in small UAS from 2020-2022, the FAA estimates respondents' burden hours will increase by 5,809 burden hours (or 1,936 average annually) when using the web portal to request operational waivers.

16. Publication of results of data collection.

Part 107 Airspace Authorizations

LAANC

The FAA does not plan on publishing any data related to Part 107 airspace authorizations or request for authorizations covered by this request to collect information.

Web Portal

The FAA does not plan on publishing any data related to Part 107 airspace authorizations or request for authorizations covered by this request to collect information.

Part 107 Airspace Waivers

Web Portal

The FAA does not plan on publishing any data related to airspace waivers or request for airspace waivers covered by this request to collect information.

Part 107 Operational Waivers

Web Portal

No requirement exists for any of the information collected to be published for statistical use. The FAA, however, posts online the waiver decisions, as described in DOT/FAA 854 – Small Unmanned Aircraft Systems (sUAS) Waivers and Authorizations (84 FR 32512, Aug. 7, 2019) for information purposes to assist prospective respondents in completing their application for an operational waiver.

17. Approval for not displaying the expiration date of OMB approval.

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

18. Exceptions to certification statement.

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