

**Department of Transportation
Federal Aviation Administration**

SUPPORTING STATEMENT

OMB 2120-XXXX

**Means of Compliance, Declarations of Compliance, and Labeling Requirements for
Unmanned Aircraft Systems with Remote Identification**

INTRODUCTION

The Department of Transportation (DOT) submits this draft Supporting Statement to the Office of Management and Budget (OMB) in preparation for requesting an approval for information collections related to the proposed rule titled “Remote Identification of Unmanned Aircraft Systems” (Remote Identification rule) (RIN 2120-AL31). DOT requests this information collection approval include information a person submits to the Federal Aviation Administration (FAA) when seeking acceptance for either a means of compliance used in the production of unmanned aircraft systems (UAS) with remote identification to ensure they meet the minimum performance requirements of the proposed rule, or a declaration of compliance used by persons responsible for the production of UAS with remote identification to demonstrate that the UAS are produced in accordance with an FAA-accepted means of compliance that meets the minimum performance requirements for UAS with remote identification. The “means of compliance” and “declaration of compliance” concepts are critical components of the framework of the proposed rule to ensure UAS meet the performance-based requirements for remote identification. In addition, this supporting statement includes a labeling requirement for producers of UAS to display a label indicating that the UAS meets the remote identification requirements imposed by the FAA.

Part A. Justification:

- 1. Circumstances that make the collection of information necessary.**

On June 28, 2016, the FAA achieved a major step towards integrating small UAS¹ into the airspace of the United States when it published the final rule for Operation and Certification of Small Unmanned Aircraft Systems.² This was one of multiple UAS-related regulatory actions taken by the FAA to enable the safe integration of UAS into the airspace of the United States.

On February 13, 2019, the FAA published three rulemaking documents as part of the next phase for integrating small UAS into the airspace of the United States. The first of such documents was an interim final rule titled “External Marking Requirement for Small Unmanned Aircraft³,” in which the FAA required small unmanned aircraft owners to display the registration number assigned by the FAA on an external surface of the aircraft. The second rulemaking document was a notice of proposed rulemaking titled “Operation of Small Unmanned Aircraft Systems Over People⁴,” in which the FAA proposed to allow operations of small unmanned aircraft over people in certain conditions and operations of small UAS at night without obtaining a waiver. The third rulemaking document was an advance notice of proposed rulemaking titled “Safe and Secure Operations of Small Unmanned Aircraft Systems⁵,” in which the FAA sought information from the public on whether and under which circumstances the FAA should promulgate new rulemaking to require stand-off distances, additional operating and performance restrictions, the use of UAS Traffic Management (UTM), additional payload restrictions, and on whether the agency should prescribe design requirements and require that unmanned aircraft be equipped with critical safety systems.

¹ Small unmanned aircraft means an unmanned aircraft weighing less than 55 pounds on takeoff, including everything that is onboard or otherwise attached to the aircraft. Small unmanned aircraft system means a small unmanned aircraft and its associated elements (including communication links and the components that control the small unmanned aircraft) that are required for the safe and efficient operation of the small unmanned aircraft in the national airspace system.

² 81 FR 42064.

³ 84 FR 3669.

⁴ 84 FR 3856.

⁵ 84 FR 3732.

As technology progresses and the utility of UAS increases, the FAA anticipates a need for further rulemaking to continue to foster a safe, secure, and efficient use of the airspace of the United States. Accordingly, the FAA believes that the next step in the regulatory process involves the enactment of regulatory requirements to enable the remote identification of UAS operating in the airspace of the United States.

The remote identification of UAS is necessary to ensure public safety and the safety and efficiency of the airspace of the United States. The remote identification framework would provide UAS-specific data, which could be used in tandem with new technologies and infrastructure to facilitate future, more advanced operational capabilities (such as detect-and-avoid and aircraft-to-aircraft communications that support beyond visual line of sight operations) and to develop the necessary elements for comprehensive UAS traffic management (UTM). Furthermore, remote identification of UAS would enable the FAA, national security agencies, and law enforcement entities to gather certain information about the UAS users of the airspace of the United States in near real-time. This information could be used to discern compliant airspace users from those potentially posing a safety or security risk.

Current rules and information collections for registration and marking of unmanned aircraft facilitate the identification of the unmanned aircraft's owner, but normally only upon physical examination of the aircraft. Existing electronic surveillance technologies like transponders and Automatic Dependent Surveillance-Broadcast (ADS-B), in addition to radio communications with air traffic control (ATC), were considered as potential solutions for the remote identification of UAS but were determined to be unsuitable. The current lack of near real-time and historical data regarding UAS operations affects the ability of the FAA to oversee the safety and security of the airspace of the United States, creates challenges for national security agencies and law enforcement entities and impedes the further integration of UAS. The Remote Identification rule proposes to address the identification issues associated with UAS by requiring the use of systems and technology to enable the remote identification of UAS.

Section 44805 of Title 49 of the United States Code (49 U.S.C.) authorizes the Administrator to establish a process for, among other things, accepting risk-based consensus safety standards related to the design, production, and modification of small UAS. Under 49 U.S.C. 44805(b)(7),

one of the considerations the Administrator must take into account prior to accepting such standards, is any consensus identification standard regarding remote identification of unmanned aircraft developed pursuant to section 2202 of Public Law 114-190.

Section 2202 of Public Law 114-190 required the Administrator to convene industry stakeholders to facilitate the development of consensus standards for remotely identifying operators and owners of UAS and associated unmanned aircraft and to issue regulations or guidance based on any standards developed.

Section 44809(f) provides that the Administrator is not prohibited from promulgating rules generally applicable to unmanned aircraft related to the registration and marking of unmanned aircraft and the standards for remotely identifying owners and operators of UAS and associated unmanned aircraft.

For purposes of the remote identification proposed rule, a means of compliance is a means of complying with the minimum performance requirements of the rule. It may take the form of a standard developed by, for example, a voluntary consensus standards body or a particular person responsible for the design or production of UAS. The FAA reviews and, if appropriate, accepts a means of compliance signifying that UAS produced in accordance with such FAA-accepted means of compliance would meet the minimum performance requirements for UAS with remote identification. The FAA would notify the public of its acceptance of a means of compliance. UAS could be produced using one or more means of compliance.

A declaration of compliance is the means by which a person responsible for the production of UAS declares that it has produced UAS in accordance with an FAA-accepted means of compliance that meets the minimum performance requirements for UAS with remote identification. The FAA will review declarations of compliance to determine whether they meet the requirements of the proposed rule. If they do, the FAA would accept the declaration of compliance and notify the public of its acceptance.

The information the FAA would review under the proposed rule includes the information included in applications requesting acceptance of a means of compliance, as well as the

information included in declarations of compliance submitted for FAA acceptance by producers of UAS with remote identification.

In addition to requesting acceptance of declarations of compliance, producers of UAS with remote identification would be required to label the unmanned aircraft to indicate that the UAS meets the remote identification requirements. The labeling requirement is meant to advise the person manipulating the flight controls of the UAS of the operational limitations of the UAS. For example, unmanned aircraft that are not equipped with remote identification equipment would be limited to operating only within FAA-recognized identification areas.

2. How, by whom, how frequently, and for what purpose the information is to be used.

Persons submitting means of compliance for acceptance by the FAA (e.g., standards setting organizations, designers of unmanned aircraft systems); persons submitting declarations of compliance for acceptance by the FAA (i.e., producers of unmanned aircraft systems) and; persons responsible for the labeling of unmanned aircraft systems (i.e., producers of unmanned aircraft systems), are as needed mandated to report, record keep and disclose information for this collection.

The FAA would use the means of compliance as a way for persons responsible for the production of standard remote identification UAS or limited remote identification UAS to demonstrate compliance with the requirements for remote identification of UAS. The FAA would use the declaration of compliance to determine that the person responsible for the production of standard remote identification UAS or limited remote identification UAS has demonstrated compliance with the requirements for remote identification of UAS. The proposed labeling requirement would assist the FAA and owners and operators of UAS to determine if the UAS meets the remote identification requirements of the proposed rule.

The information collection requirements would apply to any person requesting acceptance of a means of compliance or a declaration of compliance. This includes persons responsible for the production of UAS with remote identification operated in the United States.

a. Declaration of Compliance and Means of Compliance

General

The Remote Identification rule proposes several performance-based requirements for the remote identification of UAS that could be satisfied by more than one means of compliance. This framework requires persons responsible for the production of UAS with remote identification to use an FAA-accepted means of compliance to show that UAS were produced in accordance with the minimum performance requirements of the regulation. By adopting a performance-based approach, the FAA intends for the proposed regulation to be flexible so that persons, such as voluntary consensus standards bodies, may develop means of compliance that adjust to the fast pace of technological change, innovation, and development. The proposed rule would also establish a process by which the FAA would assess and accept means of compliance for the remote identification requirements.

The FAA expects industry stakeholders will develop means of compliance for UAS producers to use, including standards for the message elements to be broadcast and transmitted to remote identification unmanned aircraft system service suppliers (Remote ID USS), the formatting of the message elements, and the design and performance of equipment necessary to broadcast and transmit the message elements through an internet connection to a Remote ID USS. The rule would align with the direction of OMB Circular A-119, which favors the use of performance-based regulations and voluntary consensus standards. The FAA would permit any person, including a consensus standards body or a UAS designer or producer, to request acceptance by the FAA of standards developed to meet the proposed means of compliance.

The FAA would review the information submitted by persons requesting acceptance of a means of compliance to determine whether the proposed means of compliance meets the minimum performance requirements in the proposed rule. If the FAA determines that the person has demonstrated the means of compliance meets the minimum performance requirements, it would notify the person and publicize acceptance of the means of compliance. Producers of UAS with remote identification would be required to produce their UAS in accordance with the minimum performance requirements of the proposed rule using an FAA-accepted means of compliance.

Producers of UAS with remote identification would also be required to submit a declaration of compliance for FAA acceptance, declaring that they produced their UAS in accordance with the minimum performance requirements of the proposed rule using an FAA-accepted means of

compliance. The FAA would review the information submitted by UAS producers in their declarations of compliance to determine whether the UAS listed on the declarations have been produced in accordance with the minimum performance requirements of the proposed rule. If the FAA determines the producer has demonstrated that the UAS is produced in accordance with the minimum performance requirements of the proposed rule using an FAA-accepted means of compliance, it would notify the producer and publicize acceptance of the declaration of compliance. Although the UAS would not be certificated as airworthy under this rule, the FAA would rely on a producer's declaration of compliance to show that the UAS complies with the applicable remote identification requirements at the time of production.

Operators of UAS with remote identification would rely on the information in an FAA-accepted declaration of compliance to determine whether their UAS meets the requirements of the proposed rule and can therefore be operated in the airspace of the United States. The FAA is proposing that, after compliance dates listed in the proposed rule, operations of UAS without remote identification would be limited to FAA-recognized identification areas.

Means of Compliance

The FAA is proposing any person who develops means of compliance for the production of UAS with remote identification would be able to submit those means of compliance for review and acceptance by the FAA. The means of compliance would have to include testing and validation procedures for producers to demonstrate through analysis, ground test, or flight test, as appropriate, how the UAS with remote identification perform their intended functions and how they meet the remote identification requirements of the proposed rule.

To request acceptance of a means of compliance, a person would be required to submit the following information to the FAA:

- (1) The name of the person or entity submitting the means of compliance, the name of the main point of contact for communications with the FAA, the physical address, email address, and other contact information.
- (2) A detailed description of the means of compliance.

- (3) An explanation of how the means of compliance addresses all of the minimum performance requirements in the proposed rule so that any UAS with remote identification designed and produced in accordance with such means of compliance meets the remote identification requirements.
- (4) Any substantiating material the person wishes the FAA to consider as part of the request.

The FAA would indicate acceptance of a means of compliance by notifying the submitter of the acceptance of the proposed means of compliance. The FAA could also notify the public that it has accepted the means of compliance by including it on a list of accepted means of compliance at <https://www.faa.gov>. The FAA would not disclose commercially valuable information in this notice. It would only provide general information stating that FAA has accepted the means of compliance.

A person or entity who submits a means of compliance that is accepted by the FAA would have to retain the following data for as long as the means of compliance is accepted plus an additional 24 calendar months: (1) all documentation and substantiating data submitted to the FAA for the acceptance of the means of compliance; (2) records of all test procedures, methodology, and other procedures, as applicable; and (3) any other information necessary to justify and substantiate how the means of compliance enables compliance with the remote identification requirements imposed by the FAA.

Declarations of Compliance

Under the proposed rule, the following information would have to be included in a producer's declaration of compliance:

- (1) The name, physical address, telephone number, and email address of the person responsible for production of the UAS.
- (2) The UAS make and model.
- (3) The unmanned aircraft's serial number, or the range of serial numbers for which the person responsible for production is declaring compliance.

- (4) The means of compliance used in the design and production of the UAS and whether the UAS is a standard remote identification UAS or a limited remote identification UAS.⁶
- (5) Whether the declaration of compliance is an initial declaration or an amended declaration, and if the declaration of compliance is an amended declaration, the reason for the amendment.
- (6) A declaration that the person responsible for the production of the UAS can demonstrate that the UAS was designed and produced to meet the minimum performance requirements of standard remote identification UAS or limited remote identification UAS by using an FAA-accepted means of compliance.
- (7) Statement that 47 CFR-compliant radio frequency equipment is used and is integrated into UAS unmanned aircraft and control stations without modification to its authorized radio frequency parameters.

The FAA would indicate acceptance or non-acceptance of a declaration of compliance by notifying the producer. The FAA would also provide a list of accepted declarations of compliance at <https://www.faa.gov>.

A person or entity who submits a declaration of compliance that is accepted by the FAA must retain the following information for as long as the UAS listed on that declaration of compliance are produced plus an additional 24 calendar months: (1) the means of compliance, all documentation, and substantiating data related to the means of compliance used; (2) records of all test results; and (3) any other information necessary to justify the use and demonstrate compliance with the means of compliance so that the UAS meets the remote identification requirements of the proposed rule.

While many applicants who seek acceptance of a means of compliance may also seek to produce UAS, the proposed rule would permit an applicant who seeks acceptance of a means of

⁶ Under the proposed rule, a standard remote identification UAS is a UAS that is: (1) equipped to connect to the internet and transmit remote identification message elements through that internet connection to a Remote Identification UAS Service Supplier (Remote ID USS); and (2) equipped to broadcast. A limited remote identification UAS is a UAS that is: (1) designed to not operate more than 400 feet from its control station; (2) equipped to connect to the internet and transmit remote identification message elements through that internet connection to a Remote ID USS; and (3) not designed to broadcast any of the remote identification message elements.

compliance to be distinct from the applicant who seeks acceptance of a declaration of compliance.

b. Labeling

The proposed rule would require a person responsible for the production of UAS to label each unmanned aircraft to show that it meets the remote identification requirements of the proposed rule. The label would also have to indicate whether the UAS is a standard remote identification UAS or a limited remote identification UAS. The label would have to be in English and be legible, be prominently displayed, and permanently affixed to the unmanned aircraft.

The proposed labeling requirement would assist the person manipulating the flight controls of the unmanned aircraft to know where the UAS may be operated based on its remote identification capabilities. The proposed labeling requirement would also assist the FAA in its oversight role because it provides an efficient means for an inspector to evaluate whether an operation is consistent with the remote identification requirements.

3. Extent of automated information collection.

The FAA would provide a sample declaration of compliance in a fillable form. However, the FAA would not require an applicant who seeks acceptance of a declaration of compliance to use the sample form. The FAA's review of declarations of compliance and means of compliance would not lend itself to automation, because each means of compliance and declaration of compliance would likely be based on unique, commercially valuable information.

4. Efforts to identify duplication.

DOT has carefully analyzed existing information collection activities to ensure the proposed collection of information does not duplicate any other information collection in which the agency engages. DOT does not currently collect information regarding the capabilities of UAS related to remote identification. Nor does DOT collect any information regarding minimum performance requirements of UAS regarding their remote identification. However, additional rulemakings are

in process that would also establish requirements for persons responsible for the production of UAS to submit means of compliance and declarations of compliance.⁷

5. Efforts to minimize the burden on small businesses.

The information collection would involve only the information that FAA has determined is necessary to ensure compliance with the proposed performance-based requirements for remote identification. In addition, the information collection requirements would apply to all applicants, individuals as well as businesses, who design and produce UAS for operation in the airspace of the United States.

6. Impact of less frequent collection of information.

The proposed information collection related to means of compliance occurs on a one-time basis when an applicant submits a proposed means of compliance for review and acceptance by the FAA. The proposed information collection related to declarations of compliance will typically occur on a one-time basis, when an applicant declares compliance for a UAS model being produced for operation in the airspace of the United States. Additional collections of information may be necessary, from time to time, if the submitter of an FAA-accepted declaration of compliance has a need to amend the declaration of compliance.

7. Special circumstances.

No special circumstances would cause DOT to conduct the proposed information collection in a manner inconsistent with the OMB guidance on Paperwork Reduction Act compliance.

8. Compliance with 5 CFR 1320.8.

The proposed information collection activity will be the agency's first notification of the proposed collection, as stated in the Remote Identification of Unmanned Aircraft Systems notice

⁷ FAA published the Operation of Small Unmanned Aircraft Systems over People Notice of Proposed Rulemaking on February 13, 2019 (84 FR 3856). That proposed rule is also performance-based and would also require the use of means of compliance and declarations of compliance. However, the means of compliance and declarations of compliance discussed in that proposed rule relate to operations of small unmanned aircraft over people. The information sought in those means of compliance and declarations of compliance is different than the information sought in this information collection, as each rule addresses different performance capabilities of UAS.

of proposed rulemaking (RIN 2120-AL31). DOT welcomes input from the public concerning the proposed information collections outlined in its Notice of Proposed Rulemaking.

9. Payments or gifts to respondents.

No provision or payments or gifts to respondents in exchange for submitting the information would occur.

10. Assurance of confidentiality.

While no assurance of confidentiality to respondents would occur concerning the information respondents would submit in accordance with the proposed rule, the FAA would exercise care in handling any information that a submitter designates as proprietary. As stated in the notice of proposed rulemaking, the FAA anticipates informing the public of acceptance of means of compliance and declarations of compliance. However, the information that accompanies each application seeking FAA acceptance may consist of information that is commercially valuable. The agency does not intend to make such information publicly available.

11. Justification for collection of sensitive information.

DOT would not request information of a sensitive nature from any respondent.

12. Estimate of burden hours for information requested.

Means of Compliance

The FAA is proposing to require persons who develop standards that the FAA may accept as means of compliance for the production of UAS with remote identification to submit those standards for review and acceptance by the FAA. The means of compliance would include requirements for producer demonstration of how the UAS with remote identification performs its intended functions and meets the performance requirements by analysis, ground test, or flight test, as appropriate. A person who submits a means of compliance that is accepted by the FAA would be required to retain the following data for as long as the means of compliance is accepted and an additional 24 calendar months: all documentation and substantiating data submitted for the acceptance of the means of compliance; records of all test procedures, methodology, and other procedures, if applicable; and any other information necessary to justify and substantiate

how the means of compliance enables compliance with the remote identification requirements of part 89.

Table 1a: Annual Hourly Burden for Means of Compliance

Year	MOC Submitted	Total Pages	Hrs Per Page	Hourly Burden
1	1	12	1	12
2	1	12	1	12
3	1	12	1	12
Total	3	36		36

We estimate 3 respondents will submit means of compliance totaling 36 pages for a total hourly burden of 36 hours during year 1 through year 3.

The annual cost burden for a standards body or producer of remote identification unmanned aircraft to submit the means of compliance equals the number of pages per submission multiplied by the hours per page, multiplied by a total compensation wage of \$92.72.⁸ Over the three-year analysis period, the total cost to submit a means of compliance is \$0.003 million.

Table 1b: Annual Hourly Burden and Cost – Means of Compliance

Year	MOC Submitted	Total Pages	Hrs Per Page	Total Hrs	Cost Per Hour	Total Cost
1	1	12	1	12	\$92.72	\$1,112.64
2	1	12	1	12	\$92.72	\$1,112.64
3	1	12	1	12	\$92.72	\$1,112.64
Total	3	36	3	36	\$92.72	\$3,337.92

Row and column totals may not sum due to rounding.

Declaration of Compliance

The proposed rule would require the person responsible for the production of standard remote identification UAS and limited remote identification UAS to provide a declaration of compliance

⁸ It is assumed that a technical writer in the private sector would earn an amount equivalent to that of an FAA technical expert in the core compensation J Band series. The total compensation includes a wage multiplier of 1.466 (based on Table A of the Employer Costs for Employee Compensation December 2018 news release, https://www.bls.gov/news.release/archives/ecec_03192019.pdf) https://employees.faa.gov/org/staffoffices/ahr/program_policies/policy_guidance/compensation/PayTables/

to the FAA. DOT assumes, for the limited purpose of estimating the information collection burden associated with the FAA’s proposed rule, that 481 producers would be required to submit declarations of compliance based on accepted means of compliance for 1,100 models of unmanned aircraft in year 2 of the 10-year analysis period.⁹ This assumption is the basis for the hourly paperwork burden imposed on applicants for submitting a declaration of compliance to the FAA. Similarly, DOT also assumes that in each subsequent year an additional three producers will submit declarations of compliance for six new models of unmanned aircraft.

Approximately five percent of documents initially submitted to the FAA would not be accepted until reworked and resubmitted by the applicant. The annual hourly burden equals the number of pages submitted multiplied by the hours per page. The following table shows the total annual hourly burden estimated for the declaration of compliance.

**Table 2a: Annual Hourly Burden for
Declaration of Compliance based on Means of Compliance**

Year	# of Respondents	Initial Submissions	Resubmissions	Pages	Hours Per Page	Hourly Burden
1						
2	481	1,100	55.0	50	1	57,750
3	9	18	0.9	50	1	945
Total	490	1,118	55.9	50	1	58,695

Row and column totals may not sum due to rounding.

We estimate 490 respondents will submit 1,174 declarations of compliance for a total hourly burden of 58,695 hours.

The annual cost burden for the producer to submit the declaration of compliance equals the number of pages per declaration of means of compliance multiplied by the hours per page,

⁹ Based on analysis of the Association for Unmanned Vehicle Systems International (AUVSI) Unmanned Systems & Robotics Database.

multiplied by a total compensation wage of \$82.93.¹⁰ Over the three-year analysis period, the total cost to submit declaration is \$4.87 million.

Table 2b: Annual Hourly Burden and Cost – Declaration of Compliance

Year	Total Submissions	Pages Per Submission	Hours Per Page	Total Hours	Total Compensation Wage/Hour	Total Cost (\$Millions)
1						
2	1,155	50	1	57,750	\$82.93	\$4.79
3	19	50	1	945	\$82.93	\$0.08
Total	1,174			58,695	\$82.93	\$4.87

Row and column totals may not sum due to rounding.

Labeling of Unmanned Aircraft

The proposed rule would require a producer to label the UAS to show that it meets an accepted declaration of compliance from that producer. The label could be painted onto, etched into, or affixed to the aircraft by some other permanent means. A producer would likely redesign a label already affixed to the aircraft, and that the label redesign would take a maximum of two hours

Table 3a: Annual Hourly Burden Estimates for Labeling Unmanned Aircraft

Year	# of Respondents	Number of Platforms	Hours Per Redesign	Hourly Burden
1				
2	481	1,100	2	2,200
3	9	18	2	36
Total	490	1,118	2	2,236

Row and column totals may not sum due to rounding.

¹⁰ It is assumed that a technical writer in the private sector would earn an amount equivalent to that of an FAA technical expert in the core compensation J Band series using Rest of U.S. for Locality adjustment https://employees.faa.gov/org/staffoffices/ahr/program_policies/policy_guidance/compensation/PayTables/. The total compensation includes benefits of 31.8% (based on Table A of the Employer Costs for Employee Compensation December 2018 news release https://www.bls.gov/news.release/archives/ecec_03192019.pdf).

We estimate the number of respondents and responses to total 490 over the three year period. The hourly burden totals 2 hours per design per year for a total burden of 2,236 hours over the same three-year period.

A producer would likely redesign a label already affixed to the aircraft, which would take a maximum of approximately two hours at a total compensation wage of \$82.93¹¹. Over the 3-year analysis period, the total cost is \$0.185 million.

Table 3b: Annual Burden Estimates for Labeling Unmanned Aircraft (Hours)

Year	Number of Platforms	Hours Per Redesign	Hourly Burden	Cost Per Hour	Total Cost
1					
2	1,100	2	2,200	\$82.93	\$0.182
3	18	2	36	\$82.93	\$0.003
Total	1,118		2,236		\$0.185

Row and column totals may not sum due to rounding.

13. Estimate of total annual costs to respondents.

There are no capital or start up costs or operation and maintenance components affiliated with the information collection.

14. Estimate of cost to the Federal government.

The FAA estimates the number of hours for the agency to review means of compliance and notify an applicant as to whether the means of compliance has been accepted to be 192 hours.¹²

The total compensation wage for FAA subject matter experts to review the submission is \$99.19 per hour for a cost of \$19,045 per review.¹³

¹¹ Ibid.

¹² The FAA cost to review Declarations of Compliance is expected to be minimal. UAS producers will submit Declarations of Compliance through a web-portal. UAS producers can expect to get notice of acceptance or not acceptance within 5 minutes upon submission of the declaration.

¹³ Assumes review by individuals in the FAA Core Compensation Plan that are classified as Level J “Technical” and located in Washington, DC. (Source: https://employees.faa.gov/org/staffoffices/ahr/program_policies/policy_guidance/compensation/PayTables/), and a full fringe benefits of 36.25 percent (Source:

Table 4: Annual Hourly Burden and Cost for FAA Review of Means of Compliance

Year	Initial Submissions	FAA Review Time (Hours)	Total Cost
1	1	192	\$19,045
2	1	192	\$19,045
3	1	192	\$19,045
Total	3	576	\$57,135

Row and column totals may not sum due to rounding.

The FAA estimates the number of hours for the agency to review means of compliance and notify an applicant as to whether the means of compliance has been accepted to be 192 hours.¹⁴ The total compensation wage for FAA subject matter experts to review the submission is \$99.19 per hour for a cost of \$19,045 per review

To accommodate submissions for means of compliance and declarations of compliance, the FAA will develop a web portal. The FAA cost to develop the web portal is estimated to be \$1 million in year one, with follow-on maintenance costs for the portal totaling \$0.175 million per year thereafter.

Table 5: Cost for Web Portal to Submit DoC/MoC (\$Mil.)

Year	Initial Cost	Follow-On Maintenance	Total Cost
1	\$1.0		\$1.000
2		\$0.175	\$0.175
3		\$0.175	\$0.175
Total	\$1.0	\$0.350	\$1.350

Row and column totals may not sum due to rounding.

The FAA does not expect to incur any costs related to the labeling of the unmanned aircraft eligible for operations within the airspace of the United States.

The total annual cost is **\$1,407,135**. The total cost includes 576 hours of review time over a period of three years (for a cost of \$57,135), and the development of a web portal and follow-on maintenance (for a cost of \$1,350,000).

15. Explanation of program changes or adjustments.

<https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/memoranda/2008/m08-13.pdf>.

¹⁴ The FAA cost to review Declarations of Compliance is expected to be minimal. UAS producers will submit Declarations of Compliance through a web-portal. UAS producers can expect to get notice of acceptance or not acceptance within 5 minutes upon submission of the declaration.

DOT proposes to collect this information in accordance with its proposed rule to require remote identification of UAS. The FAA would use the information it collects to ensure compliance with the performance-based requirements of the proposed rule. No current program that would collect such information exists. Declaration of Compliance and Labeling of Unmanned Aircraft are included as individual Information Collections in ROCIS in this initial request although no

16. Publication of results of data collection.

No requirement exists that would obligate DOT to publish for statistical use any information collected in accordance with this collection. The proposed rule, however, notifies the public of the FAA's intent to inform the public of the FAA's acceptance of means of compliance. The FAA would also post declarations of compliance online. However, the FAA does not intend to post the information on which these decisions of acceptance are based.

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

DOT does not seek approval to refrain from displaying the expiration date of OMB approval of this proposed information collection.

18. Exceptions to certification statement.

DOT has not identified any exceptions in Item 19, OMB Form 83-I.