

**Department of Transportation
Federal Aviation Administration**

SUPPORTING STATEMENT

Small Unmanned Aircraft Registration System

OMB # 2120-XXXX

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 seeks to require additional data to be submitted during registration of unmanned aircraft systems and proposed in the Remote Identification of Unmanned Aircraft Systems notice of proposed rulemaking (Remote Identification rule) (RIN 2120-AL31). The FAA proposes to revise the registration requirements in part 48 to remove the provisions that allow small unmanned aircraft to register as model aircraft under a single Certificate of Aircraft Registration and to require the individual registration of each aircraft, regardless of its intended use. This means that every small unmanned aircraft registered under part 48 would need to have its own Certificate of Aircraft Registration. The FAA is further proposing to require that all persons registering small unmanned aircraft under part 48 – regardless of the intended use of the aircraft – include telephone number(s) for the owner, as well as the aircraft’s manufacturer, model name, and serial number as part of the registration information. The aircraft information would then be included on the Certificate of Aircraft Registration.

Part A. Justification

1. Circumstances that make collection of information necessary.

The Secretary of the Department of Transportation (DOT) and the Administrator of the Federal Aviation Administration (FAA) has affirmed that all unmanned aircraft, including model aircraft, are aircraft. As such, in accordance with 49 U.S.C. 44101(a) and as further prescribed in 14 CFR part 47 and 14 CFR part 48, registration is required prior to operation. *See* 80 FR 63912, 63913 (October 22, 2015). Aircraft registration is necessary to ensure personal accountability among all users of the airspace of the United States. Aircraft registration also allows the FAA and law enforcement agencies to address non-compliance by providing the means by which to identify an aircraft’s owner.

Subject to certain exceptions discussed below, aircraft must be registered prior to operation. *See* 49 U.S.C. 44101-44103. Upon registration, the Administrator must issue a Certificate of Aircraft Registration to the aircraft owner. *See* 49 U.S.C. 44103.

Registration, however, does not provide the authority to operate. Persons operating small unmanned aircraft exclusively for limited recreational operations may operate in compliance with 49 U.S.C. 44809 and are required to register. Persons operating small unmanned aircraft in operations that are not exclusively limited recreational operations must operate in accordance with the applicable operational part or authority. Persons operating small unmanned aircraft in operations that are not exclusively limited recreational operations must operate in accordance with the applicable operational part or authority. For example, they may operate under part 107; under part 91 with an exemption issued pursuant to 49 U.S.C. 44807 or 14 CFR part 11; or under part 91 in conjunction with the issuance of a special airworthiness certificate, and are required to register.

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 349 of Public Law 115-254 (49 U.S.C. 44809) provided 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.

As part of the efforts to remotely identify UAS flying in the airspace of the United States, the proposed Remote Identification rule would change the registration requirements to require the following UAS-specific data for each unmanned aircraft intended to be used under a Certificate of Aircraft Registration regardless of the intended operation of the unmanned aircraft:

- The unmanned aircraft manufacturer;
- The model name; and
- The unmanned aircraft's serial number.

Additionally, the FAA is proposing to amend the registration requirements to include telephone number(s) for the owner of the unmanned aircraft. The FAA proposes to revise the registration requirements in part 48 to remove the provisions that allow small unmanned aircraft to register as model aircraft under a single Certificate of Aircraft Registration and to require the individual registration of each aircraft, regardless of its intended use. This means that every small unmanned aircraft registered under part 48 would need to have its own Certificate of Aircraft Registration.

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

Owners of small unmanned aircraft, as needed, are mandated to report information to this collection. The FAA would use the telephone number, manufacturer, model, and serial number to assist with the remote identification of unmanned aircraft systems. The serial number, which may be transmitted as the unique identifier of an unmanned aircraft, would help to identify the aircraft and associate the aircraft with its owner. The FAA would use the telephone number of the owner to disseminate safety and security-related information to the registrant.

The additional information collected as part of the small unmanned aircraft registration system will provide data identifying the owners of small unmanned aircraft. It will also provide data specific to the small unmanned aircraft (i.e., manufacturer, model name, and serial number) regardless of its intended use. It will also allow the FAA to provide those persons with educational materials regarding safety of flight in the airspace of the United States to promote greater accountability and responsibility of these new users of the airspace.

In the Remote Identification rule, the FAA is proposing to require that all persons registering small unmanned aircraft under part 48 include the manufacturer, model name, and serial number of each aircraft as part of the registration information, regardless of the intended use of the aircraft. This information would be included on the Certificate of Aircraft Registration. The FAA uses the manufacturer, model name, and serial number to assist with the remote identification of unmanned aircraft systems. The serial number, which could be transmitted as the unique identifier of an unmanned aircraft, serves as a means to identify the aircraft, distinguish it from others flying in the airspace of the United States, and allows the FAA and law enforcement agencies to correlate remote identification and registration data.

The FAA recognizes that under § 48.100(a), persons who currently register their small unmanned aircraft intending to use the small unmanned aircraft as other than a model aircraft are already required to provide the aircraft manufacturer and model name, and, *if available*, the aircraft serial number. The Remote Identification rule proposes that all persons who register their small unmanned aircraft would now be required to include a serial number in the registration. Thus, some persons who have previously registered small unmanned aircraft intended for use as other than a model aircraft would be required to update the registration of that aircraft with a serial number. The serial number would have to be assigned by the manufacturer in accordance with the proposed requirements of part 89, which requires serial numbers for unmanned aircraft systems with remote identification to be compliant with the requirements of serial number standard ANSI/CTA-2063A. The FAA finds this burden to be negligible for persons who have registered their small unmanned aircraft intended for use as other than a model aircraft.

Under §§ 48.100(b), individuals who currently register their small unmanned aircraft for use exclusively as a model aircraft are not required to provide their telephone number or the aircraft manufacturer, model name, or serial number. The FAA is now proposing that all individuals who register their small unmanned aircraft intending to use the small unmanned aircraft exclusively as a

model aircraft would be required to include the manufacturer, model name, and serial number of each small unmanned aircraft in the registration. Thus, the FAA is proposing to remove §§ 48.100(b) and 48.115, which currently list the registration requirements for individuals intending to use small unmanned aircraft exclusively as a model aircraft. Sections 48.100(a) and 48.110 would become the sole means for registration under part 48 – regardless of the intended use of the unmanned aircraft – and would be revised to reflect all of the requirements that apply to the individual registration of small unmanned aircraft under part 48. Conforming changes would be made throughout part 48 to reflect the removal of §§ 48.100(b) and 48.115 and the transition to a single form of registration under part 48.

An updated Certificate of Aircraft Registration with the amended registration information would be issued to all registrants who provide serial numbers.

The FAA recognizes that some small unmanned aircraft will already have serial numbers at the time of registration, while others will require the assignment of serial numbers as part of the process of amending the registration.

Therefore, the FAA is proposing a new information collection to reflect the additional burden of adding telephone number(s) as well as the small unmanned aircraft's manufacturer, model name, and serial number to each registration.

3. Extent of automated information collection.

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

4. Efforts to identify duplication.

The registration of small unmanned aircraft is within the purview of the FAA. Title 49 U.S.C. 44101-44106, 44110-44113, 44809(a)(8) and 44809(f) require aircraft to be registered as a condition of operation and establish the requirements for registration and registration processes. No other Federal agency has similar requirements, thus there is no duplication.

The agency expects small unmanned aircraft owners to complete aircraft registration using the part 48 registration process addressed in this information collection. Alternatively, small unmanned aircraft owners may choose to register their aircraft by using the existing part 47 registration process (OMB Control No. 2120-0042).

5. Efforts to minimize the burden on small businesses.

For small businesses, the additional information required to be collected from persons intending to register small unmanned aircraft is minimal. Small business applicants currently register every small unmanned aircraft by manufacturer and model name. The only additional information required by the Remote Identification rule that would be entered by small businesses who wish to register small unmanned aircraft includes:

- (1) Applicant's phone number(s).

(2) The aircraft serial number.¹

The FAA believes that the minimal additional information requested will not significantly increase the minimal burden associated with the registration system.

The FAA emphasizes that the minimal nature of the information being collected under the small unmanned aircraft registration system discussed in this information collection should be viewed in comparison with the part 47 requirement that persons comply with the significantly more paperwork-intensive requirements of 14 CFR part 47 and OMB information collection 2120-0042. That information collection is estimated to take 30 minutes per response, as compared with the estimate of 1.4 to 2.0 minutes per response for this information collection.

6. Impact of less frequent collection of information.

Persons who own small unmanned aircraft are required to register with the FAA prior to operation of those small unmanned aircraft. Registration is effective for three years and must be renewed if the person wishes to continue to use small unmanned aircraft upon the expiration of the small unmanned aircraft Certificate of Aircraft Registration. The additional requirements would be imposed only upon the scheduled renewal of the registration or upon a new registration.

7. Special circumstances.

There are no special circumstances for this information collection.

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 of proposed rulemaking (RIN 2120-AL31). FAA welcomes input from the public concerning the proposed information collections outlined in its notice of proposed rulemaking.

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

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

10. Assurance of confidentiality.

The Privacy Act System of Records Notice DOT/FAA 801 Aircraft Registration Records, provides notice to the public of the agency's privacy practices regarding the collection, use, sharing, safeguarding, maintenance, and disposal of information that affects individuals and their personally identifiable information (PII). The SORN identifies the routine uses for the PII collected for small unmanned aircraft registration. An updated SORN that addresses the disclosure of the small unmanned aircraft owner's name and address was published to the *Federal Register* on December 15, 2015 (80 FR 77697). The FAA is updating these documents to reflect the proposed requirement for the aircraft owner's telephone number(s) and the requirement that all small unmanned aircraft be registered, regardless of use, and that all small unmanned aircraft registration records include the aircraft manufacturer, model, and serial number.

¹ Some small businesses may have already entered serial numbers for their registered unmanned aircraft that comply with the proposed rule. In such cases there would be no additional action for those applicants.

11. Justification for collection of sensitive information.

This information collection does not collect information of a sensitive nature. Only basic identifying information in the form of a telephone number would be added to the information collected for registration. The regulations require that persons using the system must be at least 13 years of age to register the small unmanned aircraft.

12. Estimate of burden hours for information requested.

The FAA estimates that the incremental time required for each recreational flyer that is not a member of a community based organization to amend the Part 48 aircraft registry to include make, model, telephone number(s), and serial number for each aircraft owned to be 1.4 minutes.² Similarly, the incremental time required for recreational flyers that are members of a community based organizations to update the Part 48 aircraft registry with make, model, telephone number(s) and serial number for each individual aircraft owned to be 2 minutes.³

The following table shows the estimated number of respondents affected the first three years after the effective date of the remote identification final rule.

Table One: Burden Hours for Recreational Flyers to Update Unmanned Aircraft Registry

Year	Recreational Flyers That Are Not CBO Members	Total Incremental Minutes (1.4 minutes/ registration)	Recreational Flyers That Are CBO Members	Total Incremental Minutes (2.0 minutes/ registration)	Total Incremental Hours
1	267,189	374,065	175,434	350,867	12,082
2	313,448	438,827	21,788	43,576	8,040
3	350,544	490,761	21,583	43,166	8,899
Total	931,181	1,303,654	218,805	437,609	29,021

Row and column totals may not sum due to rounding.

The FAA is seeking approval of an additional 29,021 hours over a three year period.

Using an opportunity cost of time for a recreational flyer of \$0.237 per minute (\$14.208 per hour), the table below presents the cost burden, which totals \$0.41 million.⁴

Table Two: Cost for Recreational Flyers to Update Unmanned Aircraft Registry

² The remote identification proposed rule assumes that recreational flyers that are not community based organization members own 1.4 aircraft each, on average.

³ The remote identification proposed rule assumes that recreational flyers that are community based organization members to be 2 aircraft each, on average

⁴ Department of Transportation Departmental Guidance on Valuation of Travel Time in Economic Analysis, September 27, 2016. Table 4 Recommended Hourly Values of Travel Time Savings, Page 17. In constant dollars, the hourly value of time for personal travel is \$14.21 per hour (\$.237 per minute). This value is used as a proxy for the value of time of someone operating UAS for recreational operations.

Year	Registrations	Hourly Burden	Total Cost (\$Mil.)
1	442,623	12,082	\$0.17
2	335,236	8,040	\$0.11
3	372,127	8,899	\$0.13
Total	1,149,986	29,021	\$0.41

Row and column totals may not sum due to rounding.

13. Estimate of total annual costs to respondents.

The information collection incorporates additional information to the process already in place for the registration of unmanned aircraft. As such, there are no additional capital costs or operation and maintenance costs affiliated with this information collection.

14. Estimate of cost to the Federal government.

The FAA will update its registration website to accommodate the changes required for recreational users of UAS. The cost for the update is \$0.75 million in year 1.

Table Three: FAA Cost to Update Small Unmanned Aircraft Registry

Year	FAA Costs (\$Mil.)
1	\$0.75
2	
3	
Total	0.75

Note: numbers may not add due to rounding

15. Explanation of program changes or adjustments.

This collection expands the information required to be provided for each small unmanned aircraft being registered. All small unmanned aircraft will now have the aircraft manufacturer, model name, and serial number included in the registration information, regardless of the use of the aircraft. Further, all small unmanned aircraft will be individually registered with the FAA.

16. Publication of results of data collection.

The System of Records Notice permits members of the public to search the collection by registration number only. The results of the search would be limited per the Department’s Privacy Act notice DOT/FAA 801 – Aircraft Registration Records. However, this capability for a public search function has never been built in to the registration system.

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.