

**SUPPORTING STATEMENT A**  
**Identification of Foreign-Registered Civil Unmanned Aircraft Operating in the  
United States**  
OMB 2120-0782

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 final rule titled “Remote Identification of Unmanned Aircraft” (Remote Identification rule) (RIN 2120-AL31). This information collection collects identifying information regarding foreign-registered civil unmanned aircraft operated in the airspace of the United States.

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

The FAA is integrating UAS operations into the airspace of the United States through a phased, incremental, and risk-based approach. An important next step in the integration process is the promulgation of regulatory requirements to enable the remote identification of unmanned aircraft operating in the airspace of the United States. Remote identification of unmanned aircraft is necessary to ensure public safety and the safety and efficiency of the airspace of the United States. Section 44809(f) of 49 U.S.C. provides that the Administrator is not prohibited from promulgating rules generally applicable to unmanned aircraft, including those unmanned aircraft eligible for the exception for limited recreational operations of unmanned aircraft. Among other things, this authority extends to rules relating to the registration and marking of unmanned aircraft and the standards for remotely identifying owners and operators of UAS and associated unmanned aircraft.

Remote identification will provide airspace awareness to the FAA, national security agencies, and law enforcement entities. This information could be used to distinguish compliant airspace users from those potentially posing a safety or security risk.

The Remote Identification rule requires standard remote identification unmanned aircraft be equipped to broadcast remote identification message elements directly from the unmanned aircraft using radio frequency spectrum.

A standard remote identification unmanned aircraft must broadcast the following remote identification message elements:

- (a) The identity of the unmanned aircraft, consisting of:
  - (1) A serial number assigned to the unmanned aircraft by the person responsible for the production of the standard remote identification unmanned aircraft; or
  - (2) A session ID.
- (b) An indication of the latitude and longitude of the control station.
- (c) An indication of the geometric altitude of the control station.
- (d) An indication of the latitude and longitude of the unmanned aircraft.
- (e) An indication of the geometric altitude of the unmanned aircraft.
- (f) An indication of the velocity of the unmanned aircraft.

(g) A time mark identifying the Coordinated Universal Time (UTC) time of applicability of a position source output.

(h) An indication of the emergency status of the unmanned aircraft.

Remote identification broadcast modules equipped on unmanned aircraft must be capable of broadcasting the following remote identification message elements:

(a) The identity of the unmanned aircraft, consisting of the serial number assigned to the remote identification broadcast module by the person responsible for the production of the remote identification broadcast module.

(b) An indication of the latitude and longitude of the unmanned aircraft.

(c) An indication of the geometric altitude of the unmanned aircraft.

(d) An indication of the velocity of the unmanned aircraft.

(e) An indication of the latitude and longitude of the take-off location of the unmanned aircraft.

(f) An indication of the geometric altitude of the take-off location of the unmanned aircraft.

(g) A time mark identifying the Coordinated Universal Time (UTC) time of applicability of a position source output.

In 14 CFR § 89.101(a)(2), the FAA is extending the operational requirements of part 89 to persons operating foreign civil unmanned aircraft in the United States. These persons must comply with the remote identification requirements in § 89.105, which means that these persons are only able to operate foreign civil unmanned aircraft in the United States that qualify as standard remote identification unmanned aircraft, unmanned aircraft equipped with remote identification broadcast modules, or unmanned aircraft that cannot identify remotely but are operated within an FAA-recognized identification area.

The FAA must be able to correlate the remote identification message elements broadcast by foreign civil unmanned aircraft operated in the United States against information that helps FAA and law enforcement identify a person responsible for the foreign civil unmanned aircraft. Where unmanned aircraft are registered in a foreign jurisdiction, the FAA may not have access to information regarding the unmanned aircraft or its registered owner. Thus, the FAA is allowing a person to operate foreign-registered civil unmanned aircraft in the United States only if the person submits a notice of identification to the Administrator. The notice includes the following information to allow FAA to associate an unmanned aircraft to a responsible person:

(1) The name of the person operating the foreign registered civil unmanned aircraft in the United States, and, if applicable, the person's authorized representative.

(2) The physical address of the person operating the foreign registered civil unmanned aircraft in the United States, and, if applicable, the physical address for the person's authorized representative. If the operator or authorized representative does not receive mail at the physical address, a mailing address must also be provided.

(3) The telephone number(s) where the person operating the foreign registered civil unmanned aircraft in the United States, and, if applicable, the person's authorized representative can be reached while in the United States.

- (4) The email address of the person operating the foreign registered civil unmanned aircraft in the United States, and, if applicable, the email address of the person's authorized representative.
- (5) The unmanned aircraft manufacturer and model name.
- (6) The serial number of the unmanned aircraft or remote identification broadcast module.
- (7) The country of registration of the unmanned aircraft.
- (8) The registration number.

Once a person submits a notice of identification, the FAA will issue a confirmation of identification. A person operating a foreign-registered unmanned aircraft in the United States must maintain the confirmation of identification at the unmanned aircraft's control station and must produce it when requested by the FAA or a law enforcement officer. The holder of a confirmation of identification must ensure the information provided under § 89.130(a) remains accurate and is updated prior to operating a foreign registered civil unmanned aircraft in the United States.

**2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

Operators of foreign-registered civil unmanned aircraft, as needed (prior to operating in the airspace of the United States) are mandated to report information to this collection. The FAA uses information provided by operators of foreign-registered civil unmanned aircraft operating in the airspace of the United States to identify those aircraft. As described previously, the FAA uses the information collected to identify foreign-registered civil unmanned aircraft operating in the airspace of the United States. The filing of the notice of identification and the issuance of a confirmation of identification would not have the effect of U.S. aircraft registration.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.**

The FAA has developed a fully automated, web-based system to collect information from owners or operators of foreign-registered civil unmanned aircraft.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

The FAA is responsible for the identification of all aircraft, manned and unmanned, operating in

the airspace of the United States. Specifically, the remote identification of owners and operators of unmanned aircraft systems and associated unmanned aircraft is within the purview of the FAA, per Title 49, United States Code, 44809(f). No other Federal agency collects this information, thus there is no duplication. The FAA emphasizes that the filing of the notice of identification and the issuance of a confirmation of identification would not have the effect of U.S. aircraft registration.

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

The information required to be collected from persons intending to operate foreign-registered civil unmanned aircraft in the airspace of the United States is minimal:

- (1) The name of the person operating the foreign registered civil unmanned aircraft in the United States, and, if applicable, the person's authorized representative.
- (2) The physical address of the person operating the foreign registered civil unmanned aircraft in the United States, and, if applicable, the physical address for the person's authorized representative. If the operator or authorized representative does not receive mail at the physical address, a mailing address must also be provided.
- (3) The telephone number(s) where the person operating the foreign registered civil unmanned aircraft in the United States, and, if applicable, the person's authorized representative can be reached while in the United States.
- (4) The email address of the person operating the foreign registered civil unmanned aircraft in the United States, and, if applicable, the email address of the person's authorized representative.
- (5) The unmanned aircraft manufacturer and model name.
- (6) The serial number of the unmanned aircraft or remote identification broadcast module.
- (7) The country of registration of the unmanned aircraft.
- (8) The registration number.

The FAA believes that the minimal nature of the information requested will significantly reduce any burden this notification system might impose particularly since the person filing a notice of identification for a foreign-registered unmanned aircraft will be able to operate the unmanned aircraft in the United States. This information collection is estimated to take 5 minutes per response for establishing an online account for filing a notice of identification plus one additional minute per additional aircraft added to the account.

**6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

Operators of foreign-registered civil unmanned aircraft operated in the airspace of the United States must notify the FAA prior to operation of the unmanned aircraft. The holder of a confirmation of identification must ensure that the information provided under § 89.130(a) remains accurate and is updated prior to operating a foreign registered civil unmanned aircraft in the United States. Thus, the information is only collected upon initial notification and any time thereafter that the information previously collected changes.

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

- *requiring respondents to report information to the agency more often than quarterly;*
- *requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;*
- *requiring respondents to submit more than an original and two copies of any document; requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;*
- *in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;*
- *requiring the use of a statistical data classification that has not been reviewed and approved by OMB;*
- *that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or*
- *requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.*

While the FAA is not requiring that the confirmation of identification provided to the person who submitted the notice of identification be retained for a specific period, the FAA is requiring that the confirmation be maintained at the unmanned aircraft's control station and produced when requested by the FAA or a law enforcement officer.

**8. Provide information on the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

The FAA provided this information collection for public comment in the Remote Identification of Unmanned Aircraft Systems notice of proposed rulemaking (RIN 2120-AL31). The FAA did not receive any comments specific to this information collection.

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

No gifts or payments are provided to respondents.

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

While the Privacy Act does not apply to this information collection, as information is being collected from persons who are not citizens or legal residents of the United States, the FAA will protect the privacy and confidentiality of the information collection. The information will not be searchable or retrievable by the public.

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.**

This information collection does not collect information of a sensitive nature. Only basic identifying information in the form of name, physical and mailing addresses, telephone number(s), and email address are collected.

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

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices. \* If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under item 13.**

The information collected for this supporting statement is similar to FAA information collection 2120-0765, Small Unmanned Aircraft Registration System. Therefore, the FAA believes the time to collect information to provide notification will be six minutes per respondent.<sup>1</sup>

**Table 1: Notice of Identification (Burden Hours)**

Yr	Part 107 Respondents <sup>2</sup>	Recreational Respondents <sup>3</sup>	Time Required to Provide Notice (Minutes)	Burden Hours
1	4,420	3,545	6	797
2	4,527	3,631	6	816
3	4,649	3,729	6	838
Total	13,596	10,905	6	2,450
Average	4,532	3,635	6	817

The opportunity cost of time for individuals intending to operate their unmanned aircraft for other than recreational purposes is estimated to be \$0.794 per minute (for a total opportunity cost of \$4.76 per notification).<sup>4</sup> Similarly, the opportunity cost of time for a recreational flyer to

<sup>1</sup> Supporting Statement, Small Unmanned Aircraft Registration System (sUAS), OMB Control Number 2120-0765; See Page 13 of the Regulatory Impact Analysis of the Interim Final Rule Regulatory Evaluation for the Registration and Marking Requirements for Small Unmanned Aircraft. RIN 2120-AK82, [https://www.faa.gov/news/updates/media/2015-12-13\\_2120-AK82\\_RIA.pdf](https://www.faa.gov/news/updates/media/2015-12-13_2120-AK82_RIA.pdf), and the Regulatory Evaluation for the Remote Identification of Unmanned Aircraft final rule, RIN 2120-AL31

<sup>2</sup> Source: FAA Unmanned Aircraft Registry for the year 2019 and Table 8, U.S. and Foreign Flag Carriers Total Passenger Traffic to/from the United States, FAA Aerospace Forecasts FY 2020-FY 2040. Growth rates from Table 8 for the years 2020-2023 applied to 2019 level.

<sup>3</sup> Ibid.

<sup>4</sup> The hourly wage earned by part 107 operators is estimated to be \$33.33 per hour. The fully-burdened hourly wage (compensation + benefits) uses a load factor 1.43 for a total of \$47.66 per hour. (\$0.794 per minute).

provide notification is \$0.242 per minute (for a total opportunity cost of \$1.45 per notification).<sup>5</sup>

**Table 2: Notice of Identification (Cost Burden \$)**

Yr	Part 107 Respondents	Part 107 Opportunity Cost of Time per Notification (\$4.76)	Recreational Flyer Respondents	Recreational Flyer Opportunity Cost of Time per Notification (\$1.45)	Total Cost Burden (\$)
1	4,420	\$21,039	3,545	\$5,140	\$26,179
2	4,527	\$21,549	3,631	\$5,265	\$26,814
3	4,649	\$22,129	3,729	\$5,407	\$27,536
Total	13,596	\$64,717	10,905	\$15,812	\$80,529
Average	4,532	\$21,572	3,635	\$5,271	\$26,843

Part 107 Respondents (Average):

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
<b># of Respondents</b>	4,532		
<b># of Responses per respondent</b>	1		
<b>Time per Response</b>	6 minutes		
<b>Total # of responses</b>	4,532		
<b>Total burden (hours)</b>	453		

Recreational Flyer Respondents (Average):

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
<b># of Respondents</b>	3,635		
<b># of Responses per respondent</b>	1		
<b>Time per Response</b>	6 minutes		
<b>Total # of responses</b>	3,635		
<b>Total burden</b>	364		

<sup>5</sup> 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 \$14.52 per hour (\$.242 per minute). This value is used as a proxy for the value of time of someone operating UAS for recreational operations.



<b>(hours)</b>			
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**13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information.**

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

**14. Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.**

To accommodate proposed changes requiring operators of foreign-registered civil unmanned aircraft to provide notice of identification, the FAA will update the website portal used for unmanned aircraft registration. The FAA cost is estimated to be a one-time cost of \$0.75 million in year 1.

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

This is a new information collection to identify foreign-registered civil unmanned aircraft operating in the airspace of the United States.

**16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

The results of this information collection will not be published.

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

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

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

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