

**Supporting Statement A**  
**Means of Compliance, Declarations of Compliance, and Labeling Requirements for**  
**Unmanned Aircraft with Remote Identification**  
**OMB 2120-0781**

- Adjustments were made to the annual hour burden estimate and annual cost estimate for this information collection. The adjustments were the result of data based on the actual number of respondents during calendar year 2023.

**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 the remote identification of 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.

Regulations regarding means of compliance are provided in 14 CFR Part 89, Subpart E. A means of compliance is a means of complying with the minimum performance requirements in 14 CFR Part 89, Subpart D. 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 a standard remote identification unmanned aircraft or the remote identification broadcast module. The FAA emphasizes that, although a means of compliance developed by a consensus standards body may be available, any individual or organization can submit its own means of compliance for FAA-acceptance. 14 CFR Part 89.405 mandates that a person submitting a means of compliance for consideration by the FAA provide identifying information that is covered by this collection. The FAA reviews and, if appropriate, accepts a means of compliance signifying that an unmanned aircraft or broadcast module produced in accordance with such FAA-accepted means of compliance would meet the minimum performance requirements for a standard remote identification unmanned aircraft or remote identification broadcast module. The FAA notifies the public of its acceptance of a means of compliance on the UAS Declaration of Compliance website at <https://uasdoc.faa.gov>.

Regulations declarations of compliance are provided in 14 CFR Part 89, Subpart F. A declaration of compliance is the means by which producers declare that they produced a standard remote identification unmanned aircraft or remote identification broadcast module in accordance with an FAA-accepted means of compliance. 14 CFR Part 89.530 mandates that a person submitting a declaration of compliance for consideration by the FAA provide identifying information that is covered by this collection. The FAA reviews declarations of compliance to determine whether they meet the applicable requirements. If they do, the FAA accepts the declaration of compliance and notifies the public of its acceptance on the UAS Declaration of Compliance website at <https://uasdoc.faa.gov>.

Producers of standard remote identification unmanned aircraft and remote identification broadcast modules are required to label the unmanned aircraft or module to indicate that they meet the remote identification requirements. The labeling requirement informs the operator that the unmanned aircraft or module meets the remote identification requirements and is eligible to be used within the airspace of 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.**

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

The FAA will use the means of compliance as a way for persons responsible for the production of standard remote identification unmanned aircraft or remote identification broadcast modules to demonstrate compliance with the performance requirements in 14 CFR Part 89, Subpart D. The FAA will use the declaration of compliance to determine that the person responsible for the production of a standard remote identification unmanned aircraft or remote identification broadcast module has met the requirements of an FAA-accepted means of compliance. The labeling requirement will assist the FAA, and owners or operators of unmanned aircraft to determine whether the standard remote identification unmanned aircraft or remote identification broadcast module meets the remote identification requirements.

The information collection requirements apply to any person requesting acceptance of a means of compliance or a declaration of compliance. This includes persons responsible for the production of a standard remote identification unmanned aircraft or remote identification broadcast module.

Means of Compliance

The FAA is requiring any person who develops a means of compliance for the production of a standard remote identification unmanned aircraft or remote identification broadcast module to submit those means of compliance for review and acceptance by the FAA. The means of compliance must include testing and validation procedures for producers to demonstrate through analysis, ground test, or flight test, as appropriate, how the standard remote identification unmanned aircraft or remote identification broadcast module perform their intended functions and how they meet the remote identification requirements.

To request acceptance of a means of compliance, a person is required to submit the following information to the FAA in accordance with 14 CFR 89.405:

- (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 rule so that any standard remote identification unmanned aircraft or remote identification broadcast module 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 will indicate acceptance of a means of compliance by notifying the submitter of the acceptance of the means of compliance. The FAA will 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://uasdoc.faa.gov>. The FAA will not disclose commercially valuable information in this notice. It will only provide general information stating that FAA has accepted the means of compliance. The FAA may disclose non-proprietary broadcast specification and radio frequency spectrum so that sufficient information is available to develop receiving and processing equipment and software for the FAA, law enforcement, and members of the public.

A person who submits a means of compliance that is accepted by the FAA is required 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

In accordance with 14 CFR 89.530, the following information must 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 standard remote identification unmanned aircraft or remote identification broadcast module.
- (2) The standard remote identification unmanned aircraft or remote identification broadcast module make and model.

- (3) The standard remote identification unmanned aircraft or remote identification broadcast module serial number, or the range of serial numbers for which the person responsible for production is declaring compliance.
- (4) The FCC Identifier of the 47 CFR part 15-compliant radio frequency equipment used and integrated into the standard remote identification unmanned aircraft or the remote identification broadcast module.
- (5) The means of compliance used in the design and production of the standard remote identification unmanned aircraft or remote identification broadcast module
- (6) 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.
- (7) A declaration that the person responsible for the production of the standard remote identification unmanned aircraft or remote identification broadcast module can demonstrate that the standard remote identification unmanned aircraft or remote identification broadcast module was designed and produced to meet the respective minimum performance requirements of standard remote identification unmanned aircraft or remote identification broadcast module by using an FAA-accepted means of compliance.
- (8) A statement that 47 CFR part 15-compliant radio frequency equipment is used and is integrated into standard remote identification unmanned aircraft or remote identification broadcast module without modification to its authorized radio frequency parameters. For the remote identification broadcast module, the declaration must include a statement that instructions have been provided for installation of 47 CFR part 15-compliant remote identification broadcast module without modification to the broadcast module's authorized radio frequency parameters.

The FAA will indicate acceptance or non-acceptance of a declaration of compliance by notifying the producer. The FAA will also publish a list of accepted declarations of compliance at <https://uasdoc.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 standard remote identification unmanned aircraft or remote identification broadcast module 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 demonstrate compliance with the means of compliance so that the standard remote identification unmanned aircraft or remote identification broadcast module meets the remote identification requirements and the design and production requirements of the rule.

While many applicants who seek acceptance of a means of compliance may also seek to produce a standard remote identification unmanned aircraft or remote identification broadcast module, the final rule permits an applicant who seeks acceptance of a means of compliance to be distinct from the applicant who seeks acceptance of a declaration of compliance.

### Labeling

14 CFR 89.525 requires a person responsible for the production of a standard remote identification unmanned aircraft or remote identification broadcast module to label each

unmanned aircraft or broadcast module to show that it meets the remote identification requirements of the rule. The label must be in English and be legible, be prominently displayed, and permanently affixed to the unmanned aircraft or broadcast module. The labeling requirement will 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. 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.**

Persons responsible for the production of a standard remote identification unmanned aircraft or remote identification broadcast module must submit electronically a request for acceptance of a declaration of compliance through the FAA website at <https://uasdoc.faa.gov>. The FAA's review of declarations of compliance and means of compliance will not lend itself to automation, because each means of compliance and declaration of compliance is based on unique, commercially valuable information.

**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. Part of the remote identification requirements are the acceptance of means of compliance and declarations of compliance. There are also requirements to label unmanned aircraft and remote identification broadcast modules. No other Federal agency collects this information, thus there is no duplication.

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

The information collection involves only the information that FAA has determined is necessary to ensure compliance with the requirements for remote identification. In addition, the information collection requirements apply to all applicants, individuals as well as businesses, who design and produce standard remote identification unmanned aircraft or remote identification broadcast modules.

**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.**

The information collection related to means of compliance occurs on a one-time basis when an applicant submits a means of compliance for review and acceptance by the FAA. The information collection related to declarations of compliance will typically occur on a one-time basis, when an applicant declares compliance when producing a standard remote identification

unmanned aircraft or a remote identification broadcast module. 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. 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.*

This information collection does not have any special circumstances.

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

A Federal Register Notice published on November 21, 2023 (88 FR 81174) solicited public comment.

One comment was received from WhoPoo App. The commenter did not address any elements of this information collection, and rather provided a copy of a news article related to production of commercial aircraft by Boeing company.

**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 no assurance of confidentiality will occur concerning the information respondents submit in accordance with this information collection, the FAA exercises care in handling any information that a submitter designates as proprietary. The FAA does not intend to make publicly available any contact information, such as address, phone number, and email address, that is submitted for a means of compliance or declaration of compliance. However, the FAA informs the public of acceptance of means of compliance and declarations of compliance on the FAA website at <https://uasdoc.faa.gov>.

If the information that accompanies a means of compliance or declaration of compliance is identified as commercially valuable, the agency does not intend to make such information publicly available.

**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.

**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.**

Means of Compliance

The FAA requires persons who develop standards that the FAA may accept as means of compliance for the production of a standard remote identification unmanned aircraft or remote identification broadcast module to submit those standards for review and acceptance by the FAA. The means of compliance includes requirements for producer demonstration of how the standard remote identification unmanned aircraft or remote identification broadcast module 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 is 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**

MOC Submitted per Year	Total Pages	Hrs Per Page	Hourly Burden
1	12	1	12

The FAA estimates 1 respondent will submit a means of compliance totaling 12 pages for a total hourly burden of 12 hours.

The annual cost burden for a standards body 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 \$94.52.<sup>1</sup>

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

MOC Submitted	Total Pages	Hrs Per Page	Total Hrs	Cost Per Hour	Total Cost
1	12	1	12	\$94.52	\$1,134.24

<sup>1</sup> 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 1.43 (based on Table A of the Employer Costs for Employee Compensation December 2018 news release, [https://www.bls.gov/news.release/archives/ecec\\_12192019.pdf](https://www.bls.gov/news.release/archives/ecec_12192019.pdf)) [https://employees.faa.gov/org/staffoffices/ahr/program\\_policies/policy\\_guidance/compensation/PayTables/](https://employees.faa.gov/org/staffoffices/ahr/program_policies/policy_guidance/compensation/PayTables/)

MOC Submitted	Total Pages	Hrs Per Page	Total Hrs	Cost Per Hour	Total Cost

### Declaration of Compliance

The final rule requires the person responsible for the production of a standard remote identification unmanned aircraft or remote identification broadcast module to provide a declaration of compliance to the FAA.

The FAA estimates the online declaration of compliance form will take approximately 0.25 hours to complete and the testing and documentation to support the online declaration will take approximately 49.75 hours to complete for a total annual burden of 50 hours per declaration of compliance. The FAA estimates that 862 declarations of compliance will be submitted per year based on actual data from 2023.

**Table 2a: Annual Hourly Burden for Declarations of Compliance**

Yearly Number of Respondents	Accepted Declarations of Compliance	Rejected or Withdrawn Submissions	Pages per Submission	Hours Per Page	Hourly Burden
862	200	662	50	1	43,100

We estimate 862 respondents will submit 862 declarations of compliance for a total hourly burden of 43,100 hours. The annual cost burden for the producer to submit the declaration of compliance equals the number of pages per declaration of compliance multiplied by the hours per page, multiplied by a total compensation wage of \$83.79.<sup>2</sup>

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

Total Submissions	Pages Per Submission	Hours Per Page	Total Hours	Total Compensation Wage/Hour	Total Cost (\$Millions)
862	50	1	43,100	\$83.79	\$3.61

<sup>2</sup> 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/](https://employees.faa.gov/org/staffoffices/ahr/program_policies/policy_guidance/compensation/PayTables/). The fully-burdened wage uses a factor of 1.43 (based on Table A of the Employer Costs for Employee Compensation December 2019 news release [https://www.bls.gov/news.release/archives/ecec\\_12182019.pdf](https://www.bls.gov/news.release/archives/ecec_12182019.pdf)).

## Labeling of Unmanned Aircraft

14 CFR Part 89.525 requires a producer to label the standard remote identification unmanned aircraft or remote identification broadcast module to show that it meets the remote identification requirements. The label could be painted onto, etched into, or affixed to the aircraft by some other permanent means. A producer may redesign a label already affixed to the aircraft, and that the label redesign would take a maximum of two hours. The estimated number of respondents for the labeling requirements is the same as the estimated number of FAA-accepted declarations of compliance per year.

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

Number of Respondents	Number of Platforms	Hours Per Label	Hourly Burden
200	200	2	400

We estimate the number of respondents to be 200 per year based on the estimated number of FAA-accepted declarations of compliance. The hourly burden totals 2 hours per design for a total annual burden estimate of 400 hours.

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 \$82.93<sup>3</sup>.

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

Number of Platforms	Hours Per Label	Hourly Burden	Cost Per Hour	Total Cost
200	2	400	\$83.79	\$33,516

### **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),**

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<sup>3</sup> Ibid.

**and any other expense that would not have been incurred without this collection of information.**

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.<sup>4</sup> The total compensation wage for FAA subject matter experts to review the submission is \$103.68 per hour for a cost of \$19,906.56 per review.<sup>5</sup>

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

Number of Means of Compliance	FAA Review Time (Hours)	Total Cost
1	192	\$19,906.56

To accommodate submissions of declarations of compliance, the FAA has developed a web portal. The FAA cost to maintain the web portal is estimated to be \$0.175 million per year.

The FAA does not expect to incur any costs related to the labeling of the unmanned aircraft or broadcast modules.

The total estimated yearly cost to the Federal Government is \$194,906.

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

Adjustments were made to the annual hour burden estimate and annual cost estimate for this information collection. The adjustments were the result of data based on the actual number of respondents during calendar year 2023.

**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.**

No requirement exists that obligates the FAA to publish for statistical use any information collected in accordance with this collection. The FAA will notify the submitter and the public when the FAA accepts a means of compliance or declaration of compliance. The FAA will also

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<sup>4</sup> The FAA cost to review Declarations of Compliance is expected to be minimal. UA producers will submit Declarations of Compliance through a web-portal. UA producers can expect to get notice of acceptance or non-acceptance within a few days upon submission of the declaration.

<sup>5</sup> 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/](https://employees.faa.gov/org/staffoffices/ahr/program_policies/policy_guidance/compensation/PayTables/)), and a fully-loaded wage factor of 1.56 (Source: <https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/memoranda/2008/m08-13.pdf>).

post declarations of compliance online at <https://uasdoc.faa.gov>. However, the FAA does not intend to post the information on which these decisions of acceptance are based.

**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.