

**Department of Transportation
Federal Aviation Administration**

**SUPPORTING STATEMENT A
Small Unmanned Aircraft Systems (sUAS) Safety Event Reporting
14 CFR part 107
OMB Control Number 2120-0767**

SUMMARY OF CHANGES IN THIS SUBMISSION:

The title of this information collection has changed from “Small Unmanned Aircraft Systems (sUAS) Accident Reporting” to “Small Unmanned Aircraft Systems (sUAS) Safety Event Reporting” to match changes in the title of the applicable regulation for this information collection. The title of 14 CFR, 107.9 was changed in 2022 from “Accident Reporting” to “Safety Event Reporting” to better reflect the purpose of the reporting requirement as well as distinguish between the FAA’s reporting requirement and the NTSB’s requirement to report “unmanned aircraft accidents” in accordance with 49 CFR, part 830.5.

This submission also includes adjustments to the estimated number of annual responses based on real-world data and updated estimates of cost to the federal government based on 2024 labor rates.

INTRODUCTION

This information collection is submitted to the Office of Management and Budget (OMB) to request a three-year renewal clearance for the information collection entitled “Small Unmanned Aircraft Systems Safety Event Reporting.”

Part A. Justification

1. Circumstances that make collection of information necessary.

To ensure proper oversight of small unmanned aircraft systems (sUAS) operations, 14 CFR § 107.9 requires a remote pilot in command to report to the FAA any sUAS operation that results in: (1) at least serious injury to any person or any loss of consciousness; or (2) damage to any property, other than the small unmanned aircraft, unless the cost of repair (including materials and labor) or fair market value in the event of total loss does not exceed \$500.

After receiving this report, the FAA may conduct further investigation to determine whether any FAA regulations were violated. The Safety Event reports may be submitted online at the FAA Drone Zone website (faadronezone.faa.gov). Alternatively, a report can be made to a Federal Aviation Administration Flight Standards District Office, one of the Regional Operations Centers, or the Washington Operations Center in a manner acceptable to the Administrator.

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

The information collected by the FAA through the submission of Safety Event reports to the DroneZone website, Flight Standards District Offices, one of the Regional Operations Centers, or the Washington Operations Center is used to investigate and determine regulatory compliance with 14 CFR, Part 107. In addition, the safety event information goes into the FAA aircraft safety event database for safety analysis purposes by the FAA Office of Accident Investigation and Analysis, pursuant to its statutory safety mission. As is currently the case for manned aircraft accidents, sUAS safety event data will be made available to the public and the National Transportation Safety Board (NTSB). Submission of safety event information is mandatory if a small unmanned aircraft safety event meets certain criteria. The affected population consists of 14 CFR Part 107 small unmanned aircraft operators. The collection requirement consists of reporting.

The following information is collected as part of a Safety Event report:

- Name
- Phone Number
- Email Address
- Remote Pilot Certificate Number
- Small Unmanned Aircraft Registration Number
- Date and Time of Safety Event
- Location of Safety Event
- Extent of Damage Caused by Safety Event
- Description of Safety Event

3. Extent of automated information collection.

The FAA collects sUAS Safety Event Report information through an online portal on its website, FAAdronezone.faa.gov. Safety Event reports may also be submitted via the FAA FSDOs, Washington Operation Center, and Regional Operations Centers in the interest of flexibility, and/or for when a remote pilot does not have internet access. All reports received so far have been through the online portal.

4. Efforts to identify duplication.

Currently, 49 CFR part 830 requires pilots and operators to report aircraft accidents to the NTSB. However, § 830.5 only requires aircraft accident reporting that involves an unmanned aircraft that causes serious injury or death, or when the aircraft holds an airworthiness certificate and sustains substantial damage. The FAA requires Safety Event Reporting when an unmanned aircraft is being operated under 14 CFR, Part 107 and there is: (1) serious injury to any person or any loss of consciousness; or (2) damage to any property, other than the small unmanned aircraft, unless the cost of repair (including materials and labor) or fair market value in the event of total loss does not exceed \$500.

The only time a duplication may arise is when the safety event involves serious injury or death, in which case the safety event must also be reported to the NTSB per 49 CFR § 830.5. In such cases, as with current aircraft Safety Event Reporting, when the FAA is the first agency to

receive a report of a safety event that fulfills the criteria of 49 CFR, § 830.5, the FAA will immediately forward that report to the NTSB, thus satisfying the § 830.5 reporting requirements without the need for the sUAS operator to provide a duplicate report to the NTSB. The FAA recognizes that because it establishes a 10-day reporting requirement while the NTSB requires “immediate notification,” it is possible that a submission forwarded onwards to the NTSB would not satisfy NTSB’s notification requirement. However, given the differing definitions of “accident” and thresholds for reporting, the FAA believes that an incident or safety event that requires reporting to both the FAA and NTSB is unlikely (to date, there have been no incidents or safety events that were reportable under 107.9 that also triggered 49 CFR 830.5). Based on the real-world usage of small UAS, the FAA does not believe that a conflict or duplication exists in practice. If, in the future, the FAA begins to identify a pattern of incidents or accidents that resulted in dual reporting, the FAA would reconsider whether it should further harmonize reporting requirements to avoid duplicative reporting.

5. Efforts to minimize the burden on small businesses.

The collection of sUAS safety event information is obtained only when a safety event occurs that meets the injury or damage thresholds for reporting. The safety event must be reported by the remote pilot in command, not the individual business entity. As such, this collection of information will not impact small businesses.

6. Impact of less frequent collection of information.

The reporting and collection of aircraft safety event data is important to the FAA for safety analysis and regulatory compliance for the FAA to fulfill its aviation safety mission as required by law. By not requiring sUAS Safety Event Reporting within 10 days of when a safety event occurs, the FAA would not be able to perform effective oversight of the sUAS industry to ensure the safety of the national airspace system.

7. Special circumstances.

No special circumstances cause the FAA to conduct the information collection in a manner inconsistent with the Office of Management and Budget guidance on Paperwork Reduction Act compliance.

8. Compliance with 5 CFR 1320.8.

The FAA sought comment in a 60-day Federal Register notice published on July 31, 2024 (89 FR 61575). No comments were received.

9. Payments or gifts to respondent.

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

10. Assurance of confidentiality.

The information collected will become part of the Privacy Act system of records notice DOT/FAA 847, General Aviation Records on Individuals and afforded the protection offered under the Privacy Act and that particular system.

11. Justification for collection of sensitive information:

Sensitive information is not requested.

12. Estimate of burden hours for information requested:

There is one page of paperwork associated with reporting a safety event which takes the respondent approximately 0.25 hours to complete.¹ The FAA receives, on average, 41 reports per year. The FAA typically does not receive more than one response per respondent.

Respondents per year: 41

Responses per year: 41

$41 \times 0.25 \text{ hours} = 10.25 \text{ hours total per year}$

Small UAS operators are not confined to any one occupation. Therefore, the FAA is using a general private sector wage, including benefits, of **\$43.94** per hour, provided by the Bureau of Labor Statistics.² In addition, the FAA uses a 17 percent estimate for overhead costs such as rent, equipment and utilities.³ $\$43.94 \times 1.17 = \mathbf{\$51.41}$ for a fully loaded wage rate.

Cost per response: $0.25 \times \$51.41 = \mathbf{\$12.85}$

Total annual cost: $10.25 \times \$51.41 = \mathbf{\$527}$

13. Estimate of total annual costs to respondents.

Not applicable.

14. Estimate of cost to the Federal government.

A typical Safety Event Report will require approximately four hours of processing and analysis (including transmission to the NTSB, if necessary) by an FAA Aviation Safety Inspector.

Assuming 41 reports, multiplied by 4 hours, the annual federal hourly burden is 164 hours.

The FAA assumes a mid-grade GS-13 salary, Rest of USA locality. Annual salary is \$117,198,⁴ divided by 2,080 hours for an hourly rate of \$56.35. The FAA uses a fringe benefits and

¹ Submitting a Safety Event Report via DroneZone requires that a remote pilot in command already have an account with that website, and have his or her UAS registered with the FAA (14 CFR part 48). However, the paperwork burden associated with registration is covered separately by 2120-0765.

² <https://www.bls.gov/news.release/ecec.nr0.htm>; "Total employer compensation costs for private industry workers averaged \$43.94 per hour worked in June 2024. Wages and salaries averaged \$30.90 per hour worked and accounted for 70.3 percent of employer costs, while benefit costs averaged \$13.04 per hour worked and accounted for the remaining 29.7 percent."

³ <https://www.regulations.gov/document?D=EPA-HQ-OPPT-2014-0650-0005>

⁴ <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2024/RUS.pdf>

overhead cost, for FAA employees, of 100%.⁵ This results in a fully loaded wage of \$112.70 per hour.

FAA Cost: 164*\$112.70 = \$18,482

15. Explanation of program changes or adjustments.

The title of this information collection is changed from “Small Unmanned Aircraft Systems (sUAS) Accident Reporting” to “Small Unmanned Aircraft Systems (sUAS) Safety Event Reporting”. This change conforms to the new title of 14 CFR, 107.9, which was changed from “accident reporting” to “safety event reporting” in 2022.

The estimate of burden hours was increased based on an increase in the estimated number of responses per year from 35 to 41. This increase was based on real-world data regarding the average number of responses per year.

16. Publication of results of data collection.

This information collection will not be published.

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

The FAA is not seeking such approval.

18. Exceptions to certification statement.

No exceptions.

⁵ U.S. Department of Health and Human Services, “Guidelines for Regulatory Impact Analysis” (2016), https://aspe.hhs.gov/system/files/pdf/242926/HHS_RIAGuidance.pdf. On page 30, HHS states, “As an interim default, while HHS conducts more research, analysts should assume overhead costs (including benefits) are equal to 100 percent of pretax wages....”