

**Supporting Statement
Small Unmanned Aircraft Registration System
OMB 2120-0765**

The following items have been revised:

- 10. Updated to reflect the correct FOIA exemption.
- 12 & 14. Updated to reflect current/correct numbers.

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

The Secretary of the Department of Transportation (DOT) and the Administrator of the Federal Aviation Administration (FAA) affirmed that all unmanned aircraft, including recreational small unmanned aircraft, are aircraft. As such, in accordance with 49 U.S.C. 44101(a) and as further prescribed in 14 CFR part 47, 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 National Airspace System (NAS).

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 registration to the aircraft owner. *See* 49 U.S.C. 44103

Congress also passed the FAA Reauthorization Act of 2018 (Pub. L. 115-254). Section 349 of the Act (49 U.S.C. 44809) does not prohibit the Administrator from promulgating rules generally applicable to unmanned aircraft related to updates to the operational parameters for unmanned aircraft used for limited recreational operations, the registration and marking of unmanned aircraft, and other standards consistent with maintaining the safety and security of the airspace of the United States.

Registration, however, does not provide the authority to operate. Persons intending to operate a small unmanned aircraft must operate in accordance with the exception for limited recreational operations (49 U.S.C. 44809), part 107 or part 91, in accordance with a waiver issued under part 107, in accordance with an exemption issued under 14 CFR part 11 (including those persons operating under an exemption issued pursuant to 49 U.S.C. 44807), or in conjunction with the issuance of a special airworthiness certificate, and are required to register.

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.

Responding to this information collection is mandatory. The information collected as part of the small unmanned aircraft registration system will identify to the FAA those persons owning small unmanned aircraft, whether the intended use is recreational, or as other than recreational. *See* item 5 below which lists the information being collected. All persons who wish to operate a small unmanned aircraft outdoors are required to register, except those that weigh 0.55 pounds or less (less than 250 grams) and are flown exclusively under the exception for limited recreational

operations. This information is collected as needed and is for reporting purposes. Only demographic information (country, city/providence/region, state, postal code, and number of registrations) is released quarterly in the FOIA library. Other information may be disclosed upon request with any individual PII redacted. Registration allows the FAA to provide respondents with educational materials regarding safety of flight in the NAS to promote greater accountability and responsibility of these new users. 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 and operator.

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 part 48 small unmanned aircraft registration system is a fully (100%) automated, web-based online registration system that requires inputting a minimal amount of information. The part 47 process, which requires mailing an application to the FAA, will remain available as an alternative process for small unmanned aircraft owners who wish to use the paper-based registration system.

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 registration of small unmanned aircraft is within the purview of the FAA. Title 49, United States Code, 44101-44106 and 44110-44113 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. Alternatively, small unmanned aircraft owners may choose to register their aircraft by using the existing part 47 registration process (OMB Control No. 2120-0042) which requires mailing an application to the FAA.

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 register small unmanned aircraft for any purpose other than exclusively limited recreational operations is minimal:

(1) Applicant name and, for an applicant other than an individual, the name of the authorized representative applying for a Certificate of Aircraft Registration.

(2) Applicant's physical address and, for an applicant other than an individual, the physical address for the authorized representative. The applicant or authorized representative must provide a mailing address if the applicant or authorized representative cannot receive mail at their physical address.

(3) Applicant's e-mail address or, for applicants other than individuals, the e-mail address of the authorized representative.

(4) Applicant's telephone number(s) and, for an applicant other than an individual, the telephone number(s) of the authorized representative.

(5) The aircraft manufacturer and model name, if available.

(6) For any standard remote identification unmanned aircraft, the serial number issued by the manufacturer of the unmanned aircraft in accordance with the design and production requirements of 14 CFR part 89. The serial number provided in this application must not be listed on more than one Certificate of Aircraft Registration at the same time.

(7) For any unmanned aircraft equipped with a remote identification broadcast module, the serial number issued by the manufacturer of the remote identification broadcast module in accordance with the design and production requirements of 14 CFR part 89. The serial number of a remote identification broadcast module provided in this application must not be listed on more than one Certificate of Aircraft Registration at the same time.

The FAA believes that the minimal information requested will significantly reduce any burden this registration system might impose.

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 current requirement that persons intending to use small unmanned aircraft other than for limited recreational operations 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 5 minutes per response for this information collection.

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.

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 Registration. The FAA would not be able to disseminate safety information to respondents or assist law enforcement and aircraft accident investigators without this collection or by limiting the frequency of this collection.

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.**

There are no 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 record keeping, disclosure, or reporting format (if any) and on the data elements to be recorded, disclosed, or reported.

A 60-day Notice was published in the Federal Register on May 22, 2022 (87 FR 37373) requesting public comment on the renewal. There were three comments:

1. An individual made the comment, “Registration should be required. I personally had a mid-air with a drone in my Cessna 170B while in Class D airspace at 1800 agl. I was authorized by the tower to be in that airspace, the drone was not...” The FAA appreciates this positive comment that reinforces the need for registering UAS.

2. The Washington State Department of Transportation made the following comments:

WSDOT views the collection of information for the purpose of Uncrewed Aircraft registration as necessary to enhance the integration of small Uncrewed Aircraft Systems into the National Airspace. This further enhances the FAA’s ability to manage a database of sUAS users for the purpose of distributing relevant information that may enhance safety and accountability of drone operations.

WSDOT believes the estimated burden outlined within the document is reasonably accurate, contingent on the user’s level of familiarity and access to the FAA’s online based registration site.

WSDOT believes making UAS registrant information publicly available and part of the registration program (similar to 14 CFR Part 47 Aircraft Registration) is a necessity to support integration efforts of UAS operations at the state level. This capability is currently omitted in the registration program under 14 CFR Part 48 registrations. WSDOT recommends the FAA’s Registration Branch mirror the Part 47 Registration Program data sharing capability to the Part 48 Registration Program, thus increasing the utility and use of the sUAS Registration Program. WSDOT currently registers crewed aircraft with the aid of FAA registration data. WSDOT, as of

April 1, 2022, also registers commercially used uncrewed aircraft but without the aid of FAA data.

WSDOT believes the burden associated with the data entry requirements for the registration of sUAS is appropriate for the required data collection elements.

The FAA appreciates WSDOT's comments that reinforce the need to register UAS. The comment regarding making UAS registrant information publicly available is outside the scope of this notice. The registration system contains Personally Identifiable Information (PII) and is protected under Exemption 6 of the FOIA.

3. Airlines for America made the following comments:

Airlines for America ("A4A")¹ appreciates the opportunity to provide these Comments in response to the Federal Aviation Administration's ("FAA") Request for Comments, which seeks renewed approval to authorize aircraft registration for Small Unmanned Aircraft Systems ("sUAS") under 49 U.S.C. 44101(a) and 14 C.F.R. part 48.

A4A strongly supports the continued collection of the requested information for sUAS registration. A4A Members have keen safety and security interests associated with the operation of sUAS in controlled airspace. With the U.S. airline industry transporting 2.4 million passengers and more than 58,000 tons of cargo a day, safety must be our top priority. Accordingly, A4A endorses the FAA's renewed proposal to collect information related to sUAS operation in controlled airspace, and to then utilize this information to implement registration requirements for sUAS in the National Airspace System ("NAS"). This proposal supports aviation safety and security through the FAA's use of collected information to determine how to implement a sUAS registration process in the NAS.

Required registration promotes safety and supports integrating sUAS into the national airspace system (NAS). The registration creates a level of transparency and accountability among all users of the national airspace. Transparency and accountability are pertinent to maintaining a safe and secure national airspace. Transparency supports agency and law enforcement action during times of safety and security issues. In the event of said enforcement action, registration creates an efficient identification process. Being able to quickly identify the owner of a sUAS supports responses in the event of threats to the safety of the NAS.

Required registration also promotes equal accountability among all users of the NAS. Registration will prevent careless or even malicious operation of sUAS because owners know they can easily be identified for their actions. Further, required registration supports counter UAS ("C-UAS") efforts to detect and classify malicious use of sUAS. After C-UAS is used to detect sUAS, the FAA will be able to assist in identifying the owner of the drone and not just the drone itself.

Conclusively, it is within the FAA's authority to assess the impacts sUAS have on safety and security within the NAS. In this instance, gathering information regarding the benefits of

required registration of sUAS supports the FAA's mission in maintaining a safe and secure national airspace.

The FAA appreciates A4A's positive comments that reinforces the need to register UAS.

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 the assurance in statute, regulation, or agency policy.

There is no assurance of confidentiality provided to respondents. Any Personally Identifiable Information (PII) is protected under Exemption 6 of FOIA.

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.

There are no questions 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.**

The hour burden is based on information collected from the small UA registration system during calendar year 2021. Each registration takes approximately 6 minutes while a de-registration takes approximately 3 minutes. The following table shows the number of registrations and de-registrations for calendar year 2021.

Year	Number of sUAS Registrations/De-Registrations			
	Part 107		Recreational	
	Register	De-Register	Register	De-Register
2021	129,965	19,768	153,796	2,142

Part 107 Register

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents	129,965		
# of Responses per respondent	1		
Time per Response	6 minutes		
Total # of responses	129,965		
Total burden (hours)	12,996.5		

Part 107 De-Register

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents	19,768		
# of Responses per respondent	1		
Time per Response	3 minutes		
Total # of responses	19,768		
Total burden (hours)	988.4		

Recreational Register

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
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numbers)			
# of Respondents	153,796		
# of Responses per respondent	1		
Time per Response	6 minutes		
Total # of responses	153,796		
Total burden (hours)	15,379.6		

Recreational De-Register

Summary (Annual numbers)	Reportin g	Recordkeepin g	Disclosur e
# of Respondents	2,142		
# of Responses per respondent	1		
Time per Response	3 minutes		
Total # of responses	2,142		
Total burden (hours)	107.1		

The FAA notes that the rule does not require an owner of a small UAS to keep records, although it should be prudent for the small UAS owner to keep a copy of the registration certificate with them in case of a law enforcement request. The registration certificate copy could be stored on their cell phone therefore any storage costs are de-minimus.

To estimate the affected owner’s personal value of time costs to register and de-register their small UAS aircraft, we multiply the annual number of affected respondents’ registrations and de-registrations by the time it will take to complete each session and then by the hourly value for personal time. The FAA assigns an hourly value of \$40.35 for the value of time for registrants.¹ The FAA estimates the annualized cost burden to respondents is approximately \$1,189,179.07.

	Number of Respondents	Time (minutes)	Burden (hours)	Hourly value	Cost Burden
Part 107	129,965	6	12,996.5	\$40.35	\$524,408.78

¹ [Employer Costs for Employee Compensation Archived News Releases: U.S. Bureau of Labor Statistics \(bls.gov\)](https://www.bls.gov/news.release/archives/empcost211201.pdf). Employer Costs for Employee Compensation – December 2021; Table 1; Total Compensation for Civilian workers. Total compensation includes costs for wages, salaries, and benefits.

Registrations					
Part 107 De-Registrations	19,768	3	988.4	\$40.35	\$39,881.94
Recreational Registrations	153,796	6	15,379.6	\$40.35	\$620,566.86
Recreational De-Registrations	2,142	3	107.1	\$40.35	\$4,321.49
Total Annual Cost Burden					\$1,189,179.07

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.

There are no additional costs to small UAS owners.

14. Provide estimates of annualized cost 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.

The FAA will incur business operation, IT program management, and other costs. IT program management costs include costs to manage and maintain the web-based system. The costs for the initial build were included in the IFR that is published in the docket,² therefore in this analysis we only report the operation and support costs of the web-based registration system.

FAA cost information for the part 48 web-based registration system was developed based on cost models and FAA data. Costs for the web-based system include costs to provide interfaces for retailers and manufacturers, the cost of providing a public search function based on the unique identifier, the cost of providing for law enforcement access, maintenance costs and the cost to update and maintain the web based system.

The web-based registration system has had other functions programmed into the system. These functions require labor and travel for their incorporation and maintenance. Also, a help desk now supports the system along with security monitoring, cloud protection, and accident reporting.

The web-based registration system is a part of the FAA DroneZone which includes other programs that aren't registration related and incurs an overall cost of \$1.67 million to operate and maintain. The FAA estimates the average annual cost burden to the FAA to only operate and maintain the web-based registration system is \$835,000.00 (approximately half of the overall cost).

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

² <https://www.regulations.gov/document?D=FAA-2015-7396-0002>

The previous numbers used to figure the cost burden to respondents in item 12 were a three year average based on estimated future projections. The FAA now has sufficient data from the small UA registration system to use instead of future projections, which significantly reduced the number of respondents reported. The previous calendar years data will be used for the current and future renewals. The previous number used to estimate the annual cost to the government in item 14 was for the entire FAA DroneZone and not the UA registration system alone. That number has been corrected to reflect only the UA registration system cost.

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.

There is no plan for tabulation or publication.

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

No such approval is being sought.

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

There are no exceptions.