

Supporting Statement A
Federal Aviation Administration
Aircraft Registration
OMB Control Number 2120-0042

Item 1 revised to add Unmanned Aircraft (UA) registration mandate.

Item 2 revised to add two new forms and move one to a different collection:

1. AC Form 8050-88UA, Affidavit of Ownership for Unmanned Aircraft (UA) - new
2. AC Form 8050-138, Declaration of International Operations- new
3. AC Form 8050-98, Aircraft Security Agreement – removed and being moved to a more appropriate collection

Items 12, 13, & 14 revised to reflect new numbers with the addition/removal of forms.

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

This information collection supports the Department of Transportation's strategic goals on safety and security. Maintaining proper registration of aircraft is fundamental to ensure compliance with operations/airworthiness safety requirements to promote the public health and safety by working toward the elimination of transportation-related deaths, injuries, and property damage. Proper registration of aircraft is necessary to advance the nation's vital security interest in support of national strategies by ensuring that the national transportation system is secure and to ensure personal accountability among all users of the National Airspace System (NAS).

The registration system provides identification of all civil aircraft in the United States. The registration records contain aircraft registration applications, recorded security interests and leases, and evidence of ownership which may be used in court if there is an ownership controversy. The form of registration certificate and the basic rules concerning aircraft identification marks are prescribed by Annex 7 to the Convention of International Civil Aviation, which the United States signed and has the force of law. Public Law 103-272 (See 49 U.S.C. 44101-44103) states that all aircraft must be registered before they may be flown. It sets forth registration eligibility requirements, provides for application for registration as well as suspension and/or revocation of registration, and recordation of conveyances, leases, and security instruments.

14 CFR Parts 47 and 49 prescribe procedures that implement Public Law 103-272. DOT/FAA – 801; Aircraft Registration System, System of Records Notice (SORN) prescribes policies and practices for storing, retrieving, accessing, retaining, and disposing of records in the registration system.

The Secretary of the Department of Transportation (DOT) and the Administrator of the Federal Aviation Administration (FAA) affirmed that all 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). Unmanned aircraft weighing 55 pounds or more must be registered pursuant to 14 CFR part 47.

The FAA Reauthorization Act of 2018 (Public Law 115-254), Section 546, "FAA Civil Aviation Registry Upgrade", requires:

1. The digitization of non-digital Registry information, including paper documents, microfilm images, and photographs, from an analog or non-digital format to a digital format;
2. The digitalization of Registry manual and paper-based processes, business operations, and functions by leveraging digital technologies and a broader use of digitized data;
3. The implementation of systems allowing a member of the public to submit any information or form to the Registry and conduct any transaction with the Registry by electronic or other remote means; and
4. Allowing more efficient, broader, and remote access to the Registry.

In response to this requirement, the FAA created Civil Aviation Registry Electronic Services (CARES) which changed this information collection to accommodate electronic submissions.

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.

This information collection is mandatory for any person or entity wanting to register an aircraft. The information is collected and used by the FAA Aircraft Registration Branch (Aircraft Registry) to 1) maintain documentation of aircraft ownership 2) register aircraft for the issuance of a registration certificate and 3) record conveyances affecting an interest in an aircraft. Bi-annual reporting of U.S. Flight Hours is also collected from corporations that are not considered U.S. citizens to monitor compliance in accordance with 14 CFR 47.9. The information collected is maintained in a database for recordkeeping purposes. As with all information collected by the Aircraft Registry this information is available to the public upon request.

Registration and evidence of ownership information is collected utilizing the following forms:

1) The AC Form 8050-1, Aircraft Registration Application, which must be used for the initial registration when ownership of an aircraft transfers from one entity to another. The form may also be used to report an address change or reinstate a cancelled registration.

2) The following five forms, though their use is not required, are available to use as evidence of ownership to accompany the AC Form 8050-1:

- AC Form 8050-2, Aircraft Bill of Sale
- AC Form 8050-88, Affidavit of Ownership for Amateur-Built and Other Non-Type Certificated Aircraft

- AC Form 8050-88A, Affidavit of Ownership for Light-Sport Aircraft
- AC Form 8050-88UA, Affidavit of Ownership for Unmanned Aircraft (UA) – This is the new form created to collect the minimal amount of information to register a UA.
- AC Form 8050-4, Certificate of Repossession of Encumbered Aircraft

3) The AC Form 8050-1B, Registration Renewal Application, is used for the stated purpose (renewal) every seven years following notification to the aircraft owner that their aircraft's registration is eligible for renewal.

4) The AC Form 8050-117, Flight Hours for Corporations Not U. S. Citizens, is used as bi-annual notification and is then returned with report data from corporations not considered U.S. citizens for compliance with 14 CFR 47.9, which requires that at least 60% of the aircraft's flight hours be in U.S. airspace.

5) The AC Form 8050-138, Declaration of International Operations. This is the new form that will be used to request priority handling of an application for registration due to an upcoming international flight.

The forms identified in items one through four and six above are or will be available for download at

https://www.faa.gov/licenses_certificates/aircraft_certification/aircraft_registry/aircraft_regn_forms/. The AC Form 8050-117 is generated automatically by the Aircraft Registry every six months and sent directly to the registered owner for completion.

When CARES is fully implemented by December 10, 2025 (this is an estimated date and subject to change), it will streamline the way these forms are submitted by providing an online portal for users to submit the forms electronically. In cases where the FAA initiates a notification to the user, such as the AC Form 8050-117, CARES will send a notification directly to the user via email. Alternatively, for public users opting to use a paper-based format, the system will send a mail-based notification to the user via the mailing address provided and anticipate any hardcopy forms be returned in a similar manner. The use of paper forms submitted through the mail will eventually be phased out and all customers will be required to file the forms using CARES.

All forms have been revised to collect the email address of the public user to help streamline processing in CARES. Some forms have been reformatted to make space available for email address and to allow for easier extraction of the information provided when mailed in. The modified paper forms will supersede all prior forms.

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.

Currently, the public user submits information and images through the mail in a paper-based format, where the Aircraft Registry enters this information into a file that is retained in an electronic based records management system. The Aircraft Registry maintains the records and does not affect the collection of information; collection of

information must originate from each individual aircraft owner or secured party, primarily through the paper-based submission process (i.e. USPS). In 2020, the Aircraft Registry began accepting digitally signed documents through an electronic submission email portal. Documents received through the email portal are printed to a paper-based format and electronically scanned into a work packet for examination and entry into the Aircraft Registry electronic records management system.

CARES utilizes modern Cloud services, which includes an interactive web-based portal, allowing for immediate transmission of information between the public user and the Aircraft Registry processor. This web-based portal streamlines the way the form information is populated and submitted into the Aircraft Registry, while also helping to ensure that correct information is provided in full. A web-based means of submitting information allows for a more guided information exchange process (e.g., pre-populating known data, providing guidance material, client-side data validation techniques, etc.), and is expected to streamline the manner and timeframe in which the full and complete application information is provided by the public user to the Aircraft Registry office for review. Currently CARES has limited capability and allows users to upload their documents for submission. However, the current legacy system is still being utilized until CARES is fully implemented.

CARES utilizes Login.gov to authenticate the identities of public users, ensuring compliance with the Federal Cybersecurity Requirements statutory mandate (6 USC § 1523 — Federal cybersecurity requirements, part (b)(1)(D)). This mandate directs agencies to implement a single sign-on trusted identity platform for individuals accessing each public website of the agency that requires user authentication. Public users must verify their identity before they are allowed to create a CARES account. Multifactor authentication is also employed during each login session to prevent identity theft. Users who fail ID verification will not be allowed to access functionalities within CARES.

In cases where the public user opts to mail paper-based forms to the Aircraft Registry, the CARES automation process will leverage Optical Character Recognition (OCR) and Intelligent Character Recognition (ICR) technologies to detect, extract, and analyze information provided on the paper forms. This information will then be properly formatted and imported into CARES, where it will be processed automatically, or redirected for FAA Examiner review when necessary.

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.

There is only one Aircraft Registry. There is no duplication of records or record-keeping.

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

The Aircraft Registry has reduced the burden on all respondents to the minimum amount necessary to register an aircraft, modify aircraft record information, and/or record a security interest. The procedures and information required are the same for all respondents.

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.

As identified in 14 CFR Parts 47 and 49, collection occurs when: an aircraft changes ownership; registered owners address changes; or an aircraft registration is renewed. Collection of flight hour data for each aircraft owned by corporations that are not U.S. citizens occurs every 6 months. Non-compliance with public law is a consequence of not collecting the information.

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, and no proprietary or confidential information is collected.

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 60-day comment period was published on (August 30, 2024) (89 FR 70681) soliciting public comments for renewal and addition of two new forms (8050-88UA and 8050-138). There was only one comment submitted by Air Line Pilots Association (ALPA). ALPA states they will continue to support the FAA and urge them to continue to create alternate methods to ensure proper registration for all UA applicants registering their aircraft. ALPA believes that this is an integral component of NAS safety and security. ALPA is in support for Requests for Comments; Clearance of Renewed Approval of Information Collection: Aircraft Registration. Furthermore, ALPA urges the FAA to continue the renewal for approvals of information collection, and to continue to analyze methods to make it even easier for UA owners to register their aircraft. The Aircraft Registry appreciates the positive comment.

The Aircraft Registry has an email portal whereby customers can submit any comments or suggestions at any time. Any comments or suggestions are reviewed and considered for possible improvements to the forms or processes in this collection.

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

No payments or gifts were provided.

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

Information collected is public information. There is no assurance of confidentiality.

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 AC Form 8050-1 and AC Form 8050-1B are the only required forms to be used by respondents. The public may report a transfer of ownership by any viable instrument that contains appropriate transfer language. Non-US citizen corporations may report their US/Non-US flight hours with the AC Form 8050-117 or by other means such as a written statement if the information is reported according to regulations.

However, on the assumption that the public makes full use of the forms the Aircraft Registry provides for the required purposes, and based on workload statistics from FY 2024, the table below shows estimates of the annual number of responses received for each of the reporting and recording requirements set forth in 14 CFR Parts 47 and 49.

Summary of Burden (rounded):

Form/Document Group	Number of Filings	Average Time in Hours	Total Hours
Evidence of Ownership Documents AC Form 8050-2 AC Form 8050-4 AC Form 8050-88 AC Form 8050-88A AC Form 8050-88UA	95,727	0.5	47,864
Applications for Registration AC Form 8050-1	74,431	0.5	37,216
Applications for Renewal (Electronic) AC Form 8050-1B	0	0.5	0
Applications for Renewal (Paper) AC Form 8050-1B	983	0.5	492
Flight Hour Reports AC Form 8050-117	1,749	0.5	875
Declaration of International Operations AC Form 8050-138	4,311	.25	1,078
Totals	177,201		87,525

Evidence of Ownership Documents (-2, -4, -88, -88A, & -88UA)

Summary (Annual numbers)	Reportin g	Recordkeepin g	Disclosur e
# of Respondents	95,727		
# of Responses per respondent	1		
Time per Response	0.5		
Total # of responses	95,727		
Total burden (hours)	47,863		

Applications for Registration (-1)

Summary (Annual numbers)	Reportin g	Recordkeepin g	Disclosur e
# of Respondents	74,431		
# of Responses per respondent	1		
Time per Response	0.5		
Total # of responses	74,431		
Total burden (hours)	37,215.5		

Applications for Renewal (-1B electronic)

Summary (Annual numbers)	Reportin g	Recordkeepin g	Disclosur e
# of Respondents	0		
# of	1		

Responses per respondent			
Time per Response	0.5		
Total # of responses	0		
Total burden (hours)	0		

Applications for Renewal (-1B paper)

Summary (Annual numbers)	Reportin g	Recordkeepin g	Disclosur e
# of Respondents	983		
# of Responses per respondent	1		
Time per Response	0.5		
Total # of responses	983		
Total burden (hours)	491.5		

Flight Hour Report (-117)

Summary (Annual numbers)	Reportin g	Recordkeepin g	Disclosur e
# of Respondents	1749		
# of Responses per respondent	1		
Time per Response	0.5		
Total # of responses	1749		
Total burden (hours)	874.5		

Declaration of International Operations (-138)

Summary (Annual numbers)	Reportin g	Recordkeepin g	Disclosur e
# of Respondents	4,311		
# of Responses per respondent	1		
Time per Response	0.25		
Total # of responses	4,311		
Total burden (hours)	1,077.75		

Entities that submit documents/forms to the Aircraft Registry come from a very broad spectrum. The range is a scale from a rural owner of a powered parachute to a corporate attorney with a Forbes company that owns a multi-million-dollar aircraft. As a result, we have used a Paralegal/Legal Assistant wage. Based upon the U.S. Bureau of Labor Statistics Occupational Handbook the estimated median wage for a Paralegal/Legal Assistant is \$29.31 per hour¹. Using BLS's Employer Costs for Employee Compensation memo released September 10, 2024,² the FAA calculated the mean hourly wage, plus benefits, for the Paralegal/Legal Assistant to be \$43.72 (\$29.31 + \$14.41). The total estimated annual cost burden to the respondents is \$43.72 x 87,525 hours' time (indicated above) for a total annual cost of \$3,826,593.00.

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

Additional costs for registration fee and postage are shown in the table below if the forms are mailed:

Forms	Responses	Cost	Total
Evidence of Ownership Documents	95,727	\$0.68	\$65,094.36
Application for Registration	74,431	\$0.68	\$50,613.08
Application for Registration with registration fee	69,736	\$5.00	\$348,680.00
Application for Renewal (Paper)	983	\$0.68	\$667.44
Flight Hour Report	1,749	\$0.68	\$1,189.32

¹ <https://www.bls.gov/ooh/legal/paralegals-and-legal-assistants.htm>

² <https://www.bls.gov/news.release/pdf/ecec.pdf>

Declaration of International Operations	4,311	\$0.68	\$2,931.48
Totals			\$469,175.68

If the forms are mailed, the total annual additional cost burden to all respondents is estimated at \$120,495.68. The cost would be significantly less if respondents submit documents through the email portal or CARES.

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.

FAA Aircraft Registration Branch Legal Instruments Examiners and contract staff process all incoming documents. Based on workload statistics from FY 2024, the chart below shows a breakout of processing time in hours for both Legal Instruments Examiner (\$31.64 per hour) and contractor (\$33.75 per hour), and related mailing costs (@ \$0.68) for distribution of some of the forms in this collection. It's estimated an Examiner spends approximately .5 hours processing a document and a contractor spends approximately .3 hours. All forms, except the -117, are available in electronic format online, but must be printed and submitted via USPS or other courier. The total annualized cost to the Federal government is \$4,615,475.

Form/Document Group		Evidence of Ownership Documents	Application for Registration	Application for Renewal (Electronic)	Application for Renewal (Paper)	Flight Hours Report	Declaration of International Operations
Counts	Mailed Out	0	0	0	0	2,304	0
	Incoming	95,727	74,431	0	983	1,749	4,311
Time in Hours	Fed	46,417	37,216	0	492	875	2,156
	Contractor	27,850	22,329	0	295	1,216	1,293
Cost In \$	Fed	\$1,468,634	\$1,177,514	\$0	\$15,567	\$27,685	\$136,400
	Contractor	\$939,938	\$753,604	\$0	\$9,956	\$41,040	\$43,639
	Mail	\$0	\$0	\$0	\$0	\$1,566.72	\$0
	Total Cost	\$2,408,572	\$1,931,118	\$0	\$25,523	\$70,223	\$180,039

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

Renewal application submissions decreased significantly due to the publication of mandated rulemaking extending the validity of aircraft registration certificates from 3 years to 7 years. The annual cost burden was adjusted to reflect the current cost of postage for the forms that are mailed. All document submissions fluctuate year to year. The annual number of responses also had to be adjusted due to a miscalculation on the previous renewals. The two new forms were not a part of this collection however the information was being submitted in the past by respondents to request expedited registration or register an unmanned aircraft. The forms have been created to make it easier for respondents to provide necessary information. The AC Form 8050-98, Aircraft Security Agreement, has been removed from this collection and moved to a more appropriate collection (OMB 2120-0043) since it is not a registration requirement.

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 are no plans for tabulation or publication of the information collected.

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.

There are no issues with displaying the expiration date for OMB approval.

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

There are no exceptions.