**Department of Transportation**

**Federal Aviation Administration**

**SUPPORTING STATEMENT A**

**Pilot Certification Unmanned Aircraft Systems**

**OMB 2120-0777**

**SUMMARY OF CHANGES IN THIS SUBMISSION:**

This submission includes adjustments to the estimated number of annual responses based on actual data and updated estimates of costs for respondents and the federal government based on 2025 labor rates.

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

The authority for collecting this information is contained in 49 U.S.C. §§ 106(g), 40113, 44702, 44703, 44709, 44710, 44711(a)(2)(A) 44709 and 14 CFR Parts 61 and 107, subpart C.

Subpart C of title 14 Code of Federal Regulations part 107 (14 CFR part 107), Small Unmanned Aircraft Systems, provides requirements for applicants to obtain a remote pilot certificate, and establishes procedures for applicants to apply for such certificates. Part 107 also has a provision for persons who already hold a pilot certificate under 14 CFR part 61 to obtain a remote pilot certificate by completing an initial training course in a manner acceptable to the Administrator.

Persons applying for a remote pilot certificate with a small UAS rating under part 107 must submit information using FAA Form 8710-13, Remote Pilot Certificate and/or Rating Application. For applicants who do not hold a pilot certificate under part 61, the Remote Pilot Certificate and/or Rating Application is submitted along with documentation demonstrating that the applicant has passed an aeronautical knowledge test. For applicants who hold a pilot certificate under part 61 and meet the flight review requirements of § 61.56, the Remote Pilot Certificate and/or Rating Application is submitted with evidence of completion of an online training course.

FAA Form 8710-13 may be submitted in paper format or electronically through the FAA’s electronic data collection system called the Integrated Airman Certification and Rating Application (IACRA). IACRA is a secure web-based application that uses online validation and digital signatures to complete the remote pilot certificate application documents. IACRA interfaces with multiple FAA databases such as knowledge testing and airman records for data validation and verification. It automatically ensures that applicants meet regulatory and policy requirements.

**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.**

The principal purpose for which the FAA intends to use the information is to identify and evaluate a persons qualifications and eligibility for the issuance of a Remote Pilot Certificate and/or rating. Submission of the data is mandatory, except for the applicant’s Social Security Number, telephone number, and email address, which are optional.

Persons applying for a remote pilot certificate with a small UAS rating under part 107 must submit information using FAA Form 8710-13, Remote Pilot Certificate and/or Rating Application. The FAA uses the information submitted on FAA form 8710-13 to evaluate whether the applicant has met the requirements necessary to be issued a remote pilot certificate.

The information submitted on FAA form 8710-13 will also be provided to the Transportation Security Administration (TSA) who will vet the applicant prior to issuance of a Remote Pilot Certificate.

The following information is collected on FAA Form 8710-13:

* Name
* Social Security Number (optional)
* Telephone Number (optional)
* Email Address (optional)
* Date of Birth
* Place of Birth
* Residential Address
* Mailing Address
* Citizenship/Nationality
* Sex
* Height
* Weight
* Hair Color
* Eye Color
* English Proficiency
* Existing Pilot Certificate
* Existing Pilot Certificate Flight Review
* Convictions for Narcotics or Drugs
* Denial of a Remote Pilot Certificate
* Physical or Mental Condition affecting ability to operate a Small Unmanned Aircraft
* Whether applying based on Knowledge Test or Training Course

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

The FAA has an electronic data collection system called the Integrated Airman Certification and Rating Application (IACRA). IACRA is a secure web-based application that uses online validation and digital signatures to complete the airman certification documents. IACRA interfaces with multiple FAA databases such as knowledge testing and airman records for data validation and verification. It automatically ensures that applicants meet regulatory and policy requirements.

IACRA improves the airman certification process by checking for data errors that cause rejected applications. The certification processing time is reduced since the applicant, recommending instructor (if required), and inspector/examiner can complete the airman application online and can submit the completed application electronically using digital signatures. OMB has used IACRA as an example of FAA’s compliance with the Government Paperwork Elimination Act.

**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 has reviewed other FAA public-use forms and reports and finds no duplication. Also, we know of no other agency collecting information from pilots and flight instructors prescribing the terms, conditions, and limitations of their operating certificates. This information is required under 14 CFR Part 61 or Part 107.

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

Reporting and record keeping requirements associated with the application and issuance of remote pilot certificates under Part 107 pertain only to individual applicants and not to business organizations. Therefore, this collection will not involve small businesses or small entities.

**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.**

An applicant for a remote pilot certificate under Part 107 must submit an application to determine compliance with the requirements of the DOT and FAA, including 49 U.S.C. 44703, 44807 and 44611. The DOT and FAA must also collect the information that Transportation Security Administration requires for compliance with 49 U.S.C. 44903(j)(2)(D)(i). If the FAA did not collect the information to enable compliance with these provisions, the FAA would not be able to conduct the oversight that sections 44703, 44807, and 44611 require.

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

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

The FAA sought comment in a 60-day Federal Register notice published on May 23, 2025 (90 FR 22146). Three (3) comments were received.

The first commenter suggests that the application process detailed and thorough due to an increase in the number of aircraft accidents. The commenter also expressed concern with potential delays in TSA vetting which could discourage certain persons from applying.

The second commenter suggested that there should be different pilot certification requirements depending on the type of UA operation being conducted. The FAA notes that the current UAS regulations do provide for different rules and requirements for different types of operations, such as commercial vs. recreational UA flights.

The third commenter highlighted the need for security and confidentiality for the information provided to the FAA.

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

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

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

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

**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.**

The Remote Pilot Certificate and/or Rating Application requires the applicant to respond to questions concerning a conviction under Federal or State statutes pertaining to narcotic drugs, marijuana, and/or stimulant drugs or substances. This information is necessary to determine whether the applicant is in compliance with appropriate 14 CFR part 61 or 14 CFR part 107 certification requirements.

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

The total number of annual responses for the Part 107 Remote Pilot Certificate and/or Rating application using FAA form 8710-13 is estimated to be 59,000 annually. The FAA estimates that one response is submitted per respondent per year.

The FAA estimates that each form submission requires an average time of 0.25 hours to complete.

Respondents per year: 59,000

Responses per year: 59,000

59,000 Reponses x 0.25 hours = 14,750 hours total per year

Because Part 107 Remote Pilot Certificate applicants come from a broad range of occupations, we use NAICS 5419 titled Other Professional, Scientific, and Technical Services to estimate an hourly wage.[[1]](#footnote-2) This results in an estimated hourly wage of $50.75, and after including an additional $22.68 average cost of benefits, results in an average hourly wage of $73.43.

59,000 Applications x 0.25 hours x $73.43 per hour = $1,083,093 annual cost

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| --- | --- | --- | --- |
|  Summary (Annual numbers) | **Reporting** | **Recordkeeping** | **Disclosure** |
| **# of Respondents** | 59,000 |  |  |
| **# of Responses per respondent** | 1 |  |  |
| **Time per Response** | 0.25 hours |  |  |
| **Total # of responses** | 59,000 |  |  |
| **Total burden (hours)** | 14,750 hours |  |  |

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

There are no additional costs associated with this collection not already included in item number 12.

**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.**

The estimated annual cost to the Federal Government is $1,141,060.

This cost is determined by estimating the time required for FAA personnel to review and process FAA form 8710-13, Remote Pilot Certificate and/or Rating Application. We estimate that 59,000 forms are submitted annually at an average file processing time by a clerical worker of 30 minutes (0.5 hours) each. The FAA is estimating that this work would be performed by Level 2 Clerical Support, at an annual salary of $49,554[[2]](#footnote-3). For federal salaries, the FAA uses a cost factor of 38.4 percent to account for benefits and overhead[[3]](#footnote-4), resulting in a total annual salary of $80,444. Assuming a 40-hour work week, this results in an hourly wage of $80,444 ÷ 2,080 = $38.68.

Therefore, for Part 107 Remote Pilot Certificate applications, we estimate an average of 59,000 forms are submitted annually which cost $38.68 per hour to process.

59,000 applications x $38.68 per hour x 0.5 hours per application = $1,141,060 total cost

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

The estimate of total burden hours was increased based on an increase in the estimated number of responses per year from 42,000 to 59,000. This increase was based on real-world data regarding the average number of responses per year. The time estimate for each response (15 minutes) is unchanged.

**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 to publish this information for statistical or other purposes.

**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 such approval.

**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.

1. Source: <https://www.bls.gov/iag/tgs/iag54.htm>, accessed 7/23/25. [↑](#footnote-ref-2)
2. <https://www.faa.gov/jobs/working_here/benefits/pay/core_salary_with_conversion.xlsx>, Clerical Support, Level 2, Average Salary of $49,554. (“Rest of U.S.” Locality Index) [↑](#footnote-ref-3)
3. https://www.bls.gov/news.release/ecec.nr0.htm [↑](#footnote-ref-4)