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Enhancing Accountability in Modelist sUAS Registration

Issue Overview

The current FAA Modelist registration framework for small Unmanned Aircraft Systems (sUAS) does not require operators to provide individual drone serial numbers (SNs). Instead, operators receive a single registration number that applies to their entire fleet. While administratively simple, this approach creates critical security gaps. Specifically, when counter-UAS detection systems capture a drone's serial number during operations, FAA's registration database often cannot correlate the SN to an operator, leaving law enforcement unable to positively identify responsible parties in real time.

National Security Concerns

This registration gap becomes most apparent during **major sporting events and other mass gatherings** protected under 14 CFR § 99.7 Temporary Flight Restrictions (TFRs). Counter-UAS passive detection systems deployed in these environments collect detailed data—including operator location, aircraft make/model, and serial number. However, because Modelist registrants are not required to submit SNs, law enforcement and FAA investigators face the following challenges:

- Inability to match SNs to operators** when drones are detected inside restricted airspace.
- Delayed investigative timelines**, undermining the rapid response needed for national security and public safety.
- Reduced deterrence**, as recreational or malicious operators may perceive registration requirements as unenforceable.

Additionally, the current **250-gram exemption threshold** allows a growing segment of recreational drones to avoid registration entirely. Field observations suggest that a disproportionate number of unsafe or

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unlawful flights involve sub-250g drones, leaving them untracked and unaccountable.

Proposed Policy Adjustments

1. Serial Number Requirement under Modelist Registration
 - Require all Modelist registrants to enter the make, model, and SN of each drone they own into their FAA registration profile.
 - Maintain the ****single \$5 operator registration fee****, preserving cost neutrality while expanding accountability.
 - Mirror the framework of Non-Modelist (Part 107) registration where individual aircraft are tied to operator records.
2. Lower the Recreational Exemption Threshold**
 - Adjust the registration exemption threshold from 250 grams to approximately ****190–200 grams****.
 - Close the current accountability gap exploited by recreational users operating drones just below the 250-gram limit.
 - Encourage safer recreational use while minimizing burdens on casual hobbyists.

Benefits

- **Enhanced Investigative Capability****: Law enforcement and FAA can immediately link drones detected in restricted airspace to specific operators via SN correlation.
- **Improved Deterrence****: Operators are less likely to fly irresponsibly if they know their drone is traceable.
- **Balanced Regulation****: Maintains affordability and ease of compliance while addressing national security needs.
- **Consistency with Aircraft Standards****: Reinforces that sUAS, as classified aircraft, must carry traceable identifiers.

Conclusion

Requiring serial numbers for drones under the Modelist registration process—while modest in cost and effort—would substantially strengthen national security, airspace safety, and enforcement effectiveness. Coupled with lowering the recreational exemption threshold, this policy shift would close a critical gap in accountability and align recreational drone oversight with the broader regulatory framework applied to all aircraft operating in the National Airspace System.

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