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Comment from CHARLES SIMPSON

Posted by the **Federal Aviation Administration** on Sep 23, 2025

[Docket \(/docket/FAA-2025-3156\)](/docket/FAA-2025-3156) / [Document \(FAA-2025-3156-0001\) \(/document/FAA-2025-3156-0001\)](/document/FAA-2025-3156-0001)
/ [Comment](#)

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Small Unmanned Aircraft Registration System: [Docket No. 2025-3156] / Published Document: 2025-18382 (90 FR 45890)

Below are my recommendations for enhancing the sUAS Modelist type registration to strengthen national security and safeguard the National Airspace. This issue warrants attention, and frankly, the solution could be relatively straightforward.

Issue Overview:

The issue at hand involves the Modelist registration process for small Unmanned Aircraft Systems (sUAS). Currently, sUAS operators under Modelist registration are not required to provide the serial number (SN) of their drones during the registration process. Instead, a single registration number is issued, which applies to all drones used by the operator. This approach has raised significant national security concerns, especially when it is critical to quickly identify the operator of a drone in sensitive situations.

National Security Concern:

One of the key challenges arises during major events like the United Nations General Assembly, where the FAA's Law Enforcement Assistance Program (LEAP) supports agencies such as the Secret Service and other federal and state law enforcement teams. A critical tool in countering unauthorized sUAS activity is passive detection systems, which are used to identify drones operating in active Temporary Flight Restrictions (TFRs). These systems not only detect the drone's location but also provide critical information about the operator's location, the make and model of the sUAS, and the drone's serial number (SN).

However, a significant problem occurs when a drone is detected by these systems. When the data is shared with FAA LEAP for further investigation, the FAA's sUAS registration database often does not return any results because the serial number was not required during the original registration under the Modelist process. This gap makes it difficult to link the detected drone to a specific operator, which undermines efforts to ensure national security and protect the National Airspace System (NAS).

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Additionally, the FAA should consider lowering the current 250-gram weight threshold for unregistered recreational drones. In my experience, the majority of illegal or irresponsible drone operations are conducted by recreational users flying drones that fall just under this limit, thereby avoiding the need for registration. This creates a loophole that is being actively exploited by some operators to bypass accountability and oversight. I believe reducing the threshold to 190–200 grams would help close this gap and promote more responsible drone usage without significantly impacting casual hobbyists.

Proposed Solution:

To address this issue, I propose a modification to the Modelist registration process. Specifically, I recommend that under Modelist registration, sUAS operators be required to enter the serial numbers (SNs) for every drone they own as part of their profile/portfolio. This change would ensure that each sUAS registered under the Modelist system can be uniquely identified, while still allowing operators to use a single registration number for all their drones. The operator would simply update their profile with the make, model, and SN of each new sUAS in their fleet.

Importantly, the cost structure would remain unchanged. The \$5 registration fee would still apply, as operators would not be registering each drone individually, but rather updating their profile with new drone details. This approach mirrors the existing process for Non-Modelist registration, where each drone is required to have its own unique registration and associated fee. Lowering the current 250-gram weight threshold

Conclusion:

This modification to the Modelist registration process would significantly enhance the ability of law enforcement and security agencies to identify and track sUAS operators, improving national security while maintaining the efficiency and cost-effectiveness of the current registration system. If sUAS are to be classified as aircraft, they must be subject to the same regulations, including the mandatory assignment of serial numbers for each registered unit, irrespective of Modelist registration.

Any questions please contact me directly: charles.simpson@faa.gov

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