SUPPORTING STATEMENT PART A

Privacy International Civil Aviation Organization (ICAO) Address (PIA)

OMB Number 2120-0779

No major changes have been made to this information collection. Labor rates have been updated to reflect currently published rates reflected in Bureau of Labor documents.

1. Explain the circumstances that make the collection of information necessary.

On May 28, 2010, the Federal Aviation Administration (FAA) published the Automatic Dependent Surveillance – Broadcast Out (ADS-B Out) Final Rule amending 14 CFR Part 91 by adding equipage requirements and performance standards for ADS–B Out avionics on aircraft operating in Classes A, B, and C airspace, as well as certain other specified classes of airspace within the U.S. National Airspace System after January 1, 2020 (75 FR 30160). ADS-B Out surveillance technology allows avionics to broadcast an aircraft's identification, position, altitude, velocity, and other information to support air traffic control (ATC) services in terminal, en route airspace, and in airport surface operations.

ADS-B Out broadcasts information about an aircraft via an onboard transponder to a ground receiver. ADS-B technology also allows third parties, who are not air traffic controllers, with privately owned ADS-B ground-based 1090-MHz receivers, to easily identify the owner/operator of ADS-B Out-equipped aircraft when received by a radio within line of sight of the aircraft. This data can be further distributed via flight tracking data sources and interfaces to the public, via the internet in real time. The ADS-B mandate created an unintended consequence of allowing the public to tap into aircraft surveillance data being broadcast automatically from the aircraft, and raised security and privacy concerns for general aviation and business aviation aircraft operators.

ADS-B technology currently continuously broadcasts an aircraft's position, velocity, International Civil Aviation Organization (ICAO) address, and other data. The central concern for some aircraft operators is the lack of provisions for blocking aircraft owners/operators from being identified by amateur plane spotters who use readily available ADS-B receivers to capture data and correlate it to the Civil Aviation Registry (CAR) to identify aircraft. This information is further disseminated online via tracking websites such as ADS-B Exchange.

The Privacy ICAO Address Program is a voluntary program initiated by the FAA that allows U.S. registered aircraft operators flying within U.S. domestic airspace to seek anonymity to mask their aircraft identity for a period of time. The Privacy ICAO Address Program will authorize U.S. registered aircraft operators/owners to use an additional, temporary ICAO address(es), instead of their uniquely assigned permanent ICAO address, which is published in the FAA's Civil Aviation Registry (CAR). The temporary address(es) will not be linked to the public ownership registry, (i.e., CAR) which connects the aircraft registration (tail number visible on all aircraft) with the owner/operator of the aircraft. This evolution in the anonymity process is greatly desired by members of the general aviation community, especially business aviation operators.

The FAA Privacy ICAO Address Program also supports Public Law 118-63 – FAA Reauthorization Act of 2024, Section 803. DATA PRIVACY. Section 803 reads: "Notwithstanding any other provision of law, including section 552(b)(3) of title 5, the Administrator of the Federal Aviation Administration shall establish and update as necessary a process by which, upon request of a private aircraft owner or operator, the Administrator withholds the registration number and other similar identifiable data or information, except for physical markings required by law, of the aircraft of the owner or operator from any broad dissemination or display (except in furnished data or information made available to or from a Government agency pursuant to a government contract, subcontract, or agreement, including for traffic management purposes) for the noncommercial flights of the owner or operator."

2. Indicate how, by whom, and for what purpose the information is to be used.

Any aircraft owner or general aviation operator, operating a Mode S/ADS-B transponder, may use the Privacy ICAO Address Program. Each aircraft is assigned an aircraft registration number and, if operating a Mode S/ADS-B transponder, an ICAO 24-bit aircraft address. This ICAO 24-bit aircraft address via the open transmission on 1090-MHz frequency makes the identity of the aircraft owner/operator publicly available. While ADS-B receivers used to track aircraft will still be able to receive ADS-B data such as the Privacy ICAO Address and call sign, it will not be possible to trace the information back to the owner because the Privacy ICAO Addresses are from a block of 50,000 ICAO Addresses from the Civil Aviation Registry that are NOT assigned to any individual.

The Privacy ICAO Address program will enable interested aircraft owners and operators to request an alternate, temporary ICAO aircraft address, which will not be assigned to the owner in the Civil Aviation Registry.

The FAA will use the information for safety and enforcement purposes. The FAA will monitor the Privacy ICAO Address use with the ADS-B Performance Monitor (APM). Aircraft

owner's data, the assigned temporary Privacy ICAO 24-bit aircraft address and information on operations associated with the Privacy ICAO Address will be stored on the ADS-B Performance Monitor (APM).

An aircraft owner or general aviation operator will request a Privacy ICAO Address through a web-based application process. The operator will be required to submit the information necessary to qualify for the authorized use of the Privacy ICAO Address service(s). Data collection occurs when aircraft owner/operator submits a Privacy ICAO Address application.

This as-needed, recordkeeping data collection includes, but is not limited to, the aircraft owner/operator's identification, information demonstrating ADS-B avionics performance compliance and information regarding the authority to use a "Third Party Flight ID."

The data collected for the Privacy ICAO Address Program is used by the following FAA entities:

1. By the Air Traffic Organization lines of business to issue a Privacy ICAO Address for the aircraft owner/operator who is eligible to receive a temporary Privacy ICAO Address through the Privacy ICAO Address Program website (https://adsbperformance.faa.gov/PIA/Application.aspx);
2. By the Air Traffic Organization lines of business to validate the installation of the avionics on the aircraft through the Public ADS-B Performance Report (PAPR). The ADS-B Performance Monitor (APM) is a National Airspace System (NAS) safety application that currently supports continued airworthiness and enforcement activities. The APM processes ADS-B surveillance data, i.e. aircraft position and avionics data, identifies ADS-B equipped aircraft operating below FAA performance requirements, and generates a list of non-compliant aircraft; and
3. By the Air Traffic Organization lines of business to validate the aircraft owner/operator has completed all steps in the Privacy ICAO Address Program process and is eligible to receive a temporary Privacy ICAO Address.

Aircraft owner(s) or operator(s) seeking anonymity and access to a temporary privacy ICAO 24-bit aircraft address in order to mask their aircraft identity will interact with the Privacy ICAO Address system(s) through a web-based application on an as needed basis. Collection of data is required to participate in the Privacy ICAO Address Program. Aircraft owner(s) or operator(s) will interact with the Privacy ICAO Address Program through a web-based application and enter appropriate information necessary to request and receive the Privacy ICAO Address service. Aircraft owners or general aviation operator's information associated with Privacy ICAO Address system will be stored on the ADS-B Performance Monitor (APM).

Disclosure: The APM will identify non-performance issues with ADS-B avionics and identify and report misuse of Privacy ICAO Address services.

Requests for Privacy ICAO Address(es) will need to be updated based on aircraft owner's or general aviation operator's privacy and security assessments. Only U.S. registered aircraft can participate in the FAA's Privacy ICAO Address Program. Additionally, operators cannot use a Privacy ICAO Address(es) for a U.S. registered aircraft, unless that operator is also using a third-party flight identification for that same aircraft. Only one unique Privacy ICAO Address will be assigned to a U.S. registered aircraft at any given time. Once approved, the aircraft owner or operator will be assigned a Privacy ICAO Address. An operator may elect to maintain the same Privacy ICAO Address overtime or may elect to request a new address not more than once every 20 days, unless emergent security concerns dictate otherwise.

While an aircraft operator would be able to continue to use the Privacy ICAO Address assignment as long as desired, aircraft operators may request regular Privacy ICAO Address reassignments because the privacy assignment information may be compromised by nefarious actors.

All aircraft information held by the FAA may be available from the FAA via FOIA unless the information falls within exceptions defined within law (5 U.S.C. § 552). This includes aircraft identification and historical flight information collected by NAS systems for flights that do not qualify for a FOIA exemption. Additionally, the FAA does consider Privacy ICAO Addresses confidential commercial information; Privacy ICAO Address assignments used solely or primarily for business use will be withheld under FOIA Exemption 6.

Prior to receiving a Privacy ICAO Address assignment, the requester will be required to submit the following information:

1. Acknowledgement of the FAA notification of collection and management of Personal Identifiable Information (PII) for the management of Privacy ICAO Address assignment and their use in the NAS;
2. Acknowledgement of the Privacy ICAO Address Program "Rules of Use" in the national airspace system;
3. Valid aircraft registration for the aircraft which will be assigned a Privacy ICAO Address (Permanent ICAO aircraft address);
4. Proof of authorization to use a third-party Flight ID with the identity of the provider;
5. Aircraft Owner's/operator's contact information (Phone number; e-mail address; and, business or home address);
6. Aircraft Owner's Individual/Company/Organization Information;

7. Requester's contact information (Phone number; e-mail address; and, business or home address);
8. Validation that the aircraft's ADS-B emitter performance is qualified for ADS-B operations (PAPR report within the past 180 days); and
9. Identify, by checking a box, whether the Privacy ICAO Address is requested for business or personal use.

Privacy ICAO Address and associated information on operations will be stored on the FAA's ADS-B Performance Monitor (APM). FAA Flight Standards will monitor the Privacy ICAO Address use with the ADS-B Performance Monitor. Aircraft owner/operator's data, the assigned Privacy ICAO Address, and information on operations associated with the Privacy ICAO Address will be stored on the ADS-B Performance Monitor (APM).

Access to surveillance data is limited to FAA federal employees and FAA contractors with login credentials to the FAA employee network. The Public ADS-B Performance Report (PAPR) can be requested by an aircraft owner/operator through the ADS-B website to confirm ADS-B Out systems are meeting compliance requirements identified in the ADS-B Out Final Rule (75 FR 30160). However, this Privacy Compliance Review (PCR) is only specific to aircraft owner/operator's data.

Information on the identification of the aircraft and its owner/operator will be available in response to security related requests from DoD, DHS, and local law enforcement on an as-needed basis.

The aircraft owners and general aviation operators will be required to submit the information necessary to qualify for the authorized use of the Privacy ICAO Address services. This includes aircraft owner/operator identification, information demonstrating ADS-B avionics performance compliance, and information regarding the authority to obtain a "Third Party Call Sign (Flight ID).

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.

An aircraft owner and/or general aviation operator will request a Privacy ICAO Address through a FAA-authorized a web-based application. The data collection is 100% electronic and automated for the respondent. The Privacy ICAO Address application information is entered at the following website: https://adsbperformance.faa.gov/PIA/Application.aspx.

The purpose of Privacy ICAO Address(es) is to address aircraft owner or operator privacy concerns. Openly providing this information to the public would defeat the purpose. A

single, permanent ICAO 24-bit aircraft address will continue to be assigned to each US registered aircraft and published in the Civil Aviation Registry. This information will continue to remain publicly accessible by law.

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.

Currently, aircraft owners and operators may request that the FAA prevent ADS-B and Mode S data from appearing on data feeds provided by the FAA through the Limiting Aircraft Data Displayed (LADD)[1] program. (76 FR 12209, August 21, 2013). To the extent that the FAA provides for anonymity through the LADD program, that program is not appropriate to achieve the same effect with the open nature of ADS-B Out broadcasts.

The open broadcasting of Mode S and ADS-B transponder technology has rendered some of the LADD program's privacy benefits to be ineffective as ADS-B data transmissions can be received and disseminated by non-government receivers and sources, such as amateur plane spotters and independent flight-tracking sites. The Privacy ICAO Address program is unique because it supplements the LADD program as it aims to mask data that originates from non-FAA sources such as onboard ADS-B transponders.

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

The FAA has made the effort to minimize the burden to aircraft owners and operators that chose to participate in the Privacy ICAO Address Program by developing a streamlined web-based Privacy ICAO Address Program application. FAA seeks to streamline Privacy ICAO Address Program applications by using web-based means for initiating requests from aircraft owners and aircraft operations and receiving responses.

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.

After January 1, 2020, aircraft operators must be equipped with ADS-B Out to fly in most controlled airspace pursuant to 14 CFR §§ 91.225 and 91.227.

If information required to support a Privacy ICAO Address request is not collected, the privacy of general aviation (GA) operators may be compromised. The privacy risks

[1] Formerly known as the Block Aircraft Registration Request [BARR], which was formerly named Aircraft Situation Display to Industry [ASDI]

associated with ADS-B Out have been cited as a barrier to equipage. Privacy is strongly desired by this community for reasons that include, but are not limited to, prevention of corporate espionage and terrorism.

The FAA Privacy ICAO Address Program establishes a process for any flight equipped with ADS-B Out technologies and 1090-MHz transponder avionics to operate with anonymity. The program will authorize U.S. Registered Operators only to use an additional ICAO address for privacy purposes, known as a Privacy ICAO Address, in lieu of its uniquely permanently assigned ICAO addressed published in the Civil Aviation Registry (CAR). Supporting the need of industry to limit the availability of real-time aircraft identification information will lead to better compliance with ADS-B Out equipage requirements.

The data collection is also necessary to monitor the use of the privacy ICAO address(es) and to support as necessary DoD, DHS and Law Enforcement real time identification of operations of interest. To effectively meet these objectives, it is necessary to collect Privacy ICAO Address assignments and associate them with the associated aircraft prior to operations with the assigned Privacy ICAO Address.

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.**

This program will not require the collection of information under any of the eight aforementioned special circumstances as it is an entirely voluntary program that only requires aircraft and its respective owners/operator’s data to be collected.

While an aircraft operator may keep a Privacy ICAO Address assignment as long as desired, aircraft operators may request a new Privacy ICAO Address on a periodic basis but not more frequently than once every 20 days unless extenuating circumstances necessitate (personal safety, imminent danger or harm, etc.).

An aircraft operator may use the permanent ICAO address originally assigned and recorded in the Civil Aviation Registry (CAR) at any time for operations, including any time while having an active Privacy ICAO Address assignment. Use of the permanently assigned ICAO aircraft address recorded in the Civil Aviation Registry (CAR) is required for all flights leaving U.S. domestic airspace, and it may be used for any other flight at any time, as desired by the aircraft operator. However, the FAA requires that the aircraft operator submits documented validation that an ICAO code has been correctly installed into the aircraft's ADS-B avionics after each change.

8. Provide information on the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission.

A Federal Register Notice published on 29 June 2026 (91 FR 39161) solicited public comment. No comments were received.

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

Not applicable – There are no payments or gifts provided to respondents.

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

Assurance of confidentiality is not provided to respondents.

ICAO 24-bit aircraft address assigned to a US registered aircraft under the Privacy ICAO Address Program will not be published in the CAR.

All aircraft information held by the FAA may be available from the FAA via FOIA unless the information falls within an exception defined within law (5 U.S.C. § 552). This includes aircraft identification and historical flight information collected by NAS systems for flights which do not qualify for a FOIA exemption.

10. 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.

11. Provide estimates of the hour burden of the collection of information.

FAA's Privacy ICAO Address Program is intended for operators who desire anonymity such that their aircraft movements and identity cannot be easily traced or seen by non-FAA owned/operated sensors that monitor the 1090 MHz frequency. FAA estimates that between 10,000 - 15,000 aircraft owners and operators may seek Privacy ICAO Address(es) and chose to participate in FAA's Privacy ICAO Address Program. Aircraft owners and operators may request Privacy ICAO Address(es) at any time. However, only one unique Privacy ICAO Address will be assigned to a U.S.-registered aircraft at any given time. The aircraft owner or operator of a U.S. registered aircraft may request a secondary, Privacy ICAO Address be changed at a pre-determined maximum frequency. An operator may change a Privacy ICAO Address for an aircraft not more than once every 20 days (unless otherwise stated in Section 7).

The FAA calculates the burden as follows:

- **Respondents:** 15,000 (This number is based on information gathered during stakeholder engagements around the ADS-B Out Final Rule.)
- **Time per Response:** 15 minutes or ¼ hour
- **Total Responses**: 50,250 (The FAA estimates that 25% of respondents (3,750) will request a single Privacy ICAO Address, 25% (3,750) will request a Privacy ICAO address twice a year, 20% (3,000) will request a Privacy ICAO Address three times a year, 20% (3,000) will request four times a year, and 10% (1,500) will request an address 12 times a year, or every 20 days.)

Percentage of Users	Times a Year	# Users	Responses
25%	1 time a year (yearly) X1	3,750	3,750
25%	2 times a year (semi-annual) X2	3,750	7,500
20%	3 times a year X3	3,000	9,000
20%	4 times a year (quarterly) X4	3,000	12,000
10%	Every 20 days X12	1,500	18,000
100%		**15,000**	**50,250**

- **Frequency of Response:** 3.35/yr (50,250 responses/15,000 respondents)
- **Burden:** 12,563 hrs (15,000 respondents * 3.35 responses *25 minutes)

Summary (Annual numbers)	Reporting
# of Respondents	15,000
# of Responses per respondent	3.35
Time per Response	.25/hr (15 minutes)
Total # of responses	50,250
Total burden (hours)	12,563

Assuming the labor category for General and Business Aviation pilots to be Management, Professional, and Related with a total compensation (100%) labor hour cost, i.e., fully burdened of $66.88 per hour (Table 2. Employer Costs for Employee Compensation for civilian workers by occupational and industry group, Bureau of Labor Statistics, U.S. Department of Labor, dated September 2022 https://www.bls.gov/news.release/ecec.t02.htm), the burden for each aircraft owner/operator to apply for a Privacy ICAO Address (https://adsbperformance.faa.gov/PIA/Application.aspx) is:

0.25/hr. X $66.88/hr. = $16.72

The annual cost burden of 15,000 aircraft owners at an average of 3.35 responses per respondent and applying for Privacy ICAO Address(es) is:

$16.72/respondent X 15,000 respondents X 3.35 responses per respondent = $840,180.00 per annum.

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

Aircraft owner or operators will have an additional unknown out-of-pocket cost dependent on aircraft and aircraft operations and not identified. Upon receiving the assigned Privacy ICAO Address, the requester has 30 calendar days to program his/her ADS-B transponder to the assigned Privacy ICAO Address, fly in ADS-B coverage airspace, and complete the verification process via the website. For the purposes of the Privacy ICAO Address program, a flight in any ADS-B coverage airspace will suffice for the sake of a Privacy ICAO test flight. Moreover, the test does not need to be a dedicated flight. Aircraft owners/operators may elect to complete

the test as part of any routine flight following the installation of a Privacy ICAO Address.

13. 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 total cost to the Federal government is based on annualized hours of effort for the labor category of; Management, Professional, and Related for FAA government employees based on the information provided is $66.48 per hour which includes total compensation and fringes.[2] To account for overhead costs such as rent, utilities and office equipment, 17 percent was added to the total compensation and fringes calculations

Labor Category: Management, Professional and Related Cost	Calculations	Cost
Implementation (Program Management and Setup, Website Development, Maintenance) **Labor ($66.88/hr.)**	$66.88/hr. x 900 (approx.) hrs. Adjustment of 17% to account for overhead costs.	$60,192 $10,233
Operations **Labor ($66.88/hr.)**	$66.88/hr. x 3,744 hrs. Adjustment of 17% to account for overhead costs.	$250,399 $42,568
Maintenance **Labor ($67.35/hr.)**	$42.77/hr. x 240hrs.	$10,265
Total		**$373,657**

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

This document contains no major changes and updates the labor rates used to reflect the burden.

15. For collections of information whose results will be published, outline plans for tabulation and publication.

[2] Table 2. Employer Costs for Employee Compensation for civilian workers by occupational and industry group, News Release, Bureau of Labor Statistics, U.S. Department of Labor, USDL-19-1649 https://www.bls.gov/news.release/ecec.t02.htm

Not applicable – The results of the Privacy ICAO Address Program or information will not be published.

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

This information collection is not seeking approval to not display the expiration date.

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

None – There are no exceptions to the certification statement.