

August 21, 2020

**BEFORE THE
FEDERAL AVIATION ADMINISTRATION
U.S. DEPARTMENT OF TRANSPORTATION
WASHINGTON, DC**

In the Matter of:

**Agency Information Collection Activities:
Requests for Comments;
Clearance of Renewed Approval of Information
Collection: Aircraft Registration**

Docket FAA-2020-0046

COMMENTS OF AIRLINES FOR AMERICA

Airlines for America (“A4A”) appreciates the opportunity to submit these Comments on behalf of its members¹ in response to the Federal Aviation Administration’s (“FAA”) information collection approval renewal, Aircraft Registration (“Aircraft Registration Renewal”).² We appreciate the opportunity to provide the evidence herein because our members have over 3400 aircraft registered in the United States and operate an additional 1300 aircraft, for which the burdens and/or costs of registration and reregistration ultimately rest with the airlines and their customers. Further, the current state of the industry with the COVID-19 pandemic reinforces an existing need to modernize the aircraft registration process to reduce unnecessary personal contact by leveraging technology, in addition to other efficiencies that will facilitate compliance while reducing costs.

We respectfully submit that the FAA’s current aircraft registration requirements have not kept pace with changes in the aircraft market nor the digital communications revolution. Paper

¹ A4A’s members are: Alaska Air Group, Inc.; American Airlines Group, Inc.; Atlas Air Worldwide Holdings, Inc.; Delta Air Lines, Inc.; FedEx Corp.; Hawaiian Airlines; JetBlue Airways Corp.; Southwest Airlines Co.; United Airlines Holdings, Inc.; and United Parcel Service Co. Air Canada is an associate member.

² 85 Fed. Reg. 44,355 (July 22, 2020).

originals must be kept onboard the aircraft and copies or electronic versions are not acceptable.³

The FAA's aircraft registration requirements do not align with 21st Century aircraft ownership and interest tracking systems, such as that of the International Registry. Nor do the FAA's requirements reduce costs and burdens, as it has repeatedly renewed its related information collection and paper forms to support a pre-Internet registration regime. While A4A and its Members support an accurate registry, we have repeatedly asserted and continue to believe that better and less burdensome means exist for commercial air carriers to ensure accuracy of aircraft registrations than the re-registration of aircraft every three years, including submitting paper applications.

We appreciate the FAA's changes in recent years to facilitate the registration and reregistration processes, including the use of PDFs and acceptance digital/electronic signatures, as well as the option to renew through an online portal when changes are not made to the registration information. We also recognize the narrow context of this Aircraft Registration Renewal. However, we urge the FAA to continue its modernization efforts to improve the efficiency of the registration process, as well as reduce burdens and costs on registrants, particularly for air carriers who have a demonstrated capability to track and meet regulatory requirements on large fleets of aircraft despite the challenges with frequent trading among aircraft lessors. Modern and large air carriers have sophisticated maintenance tracking programs and accomplish many maintenance tasks while aircraft are on the ground at stations spanning the entire globe. To that end, airlines should be empowered to utilize authorized copies of valid registration documents to enable tracking within existing maintenance tracking programs, and,

³ *But see* 14 C.F.R. § 91.203; FAA Exemption No. 5318O (May 31, 2020) (allowing logbook entries when the certificate is lost or mutilated; Notice of Legal Opinion, 53 Fed. Reg. 50, 2008 (Dec. 14, 1988) (allowing a telex copy to accommodate international operators after confirmation of the information on the registration application and determination of eligibility for registration).

importantly, enable valid copies to be transmitted instantly anywhere in the world where overnight maintenance is accomplished. This makes sense from an efficiency standpoint and would not diminish the accuracy of registry information since the privilege would be based on an individual airline's demonstrated ability to meet all requirements for accuracy and timeliness. In the era of COVID-19, this would also reduce human contacts necessary for physically mailing registration applications and original certificates to wherever aircraft are located and reduce associated expenses.

For the above reasons, we strongly urge that the FAA make the following changes to its registration process to reduce the unnecessary burdens of airlines:

- Implement a secure electronic registration system that would track aircraft ownership changes in real-time, be available at all times, and from which a carrier would download a replacement certificate immediately;
- For renewals, allow for updates in current-owner information (*e.g.*, new mailing address) or corrections through the existing online renewal system; and
- Take appropriate measures so that an authorized copy of a valid registration certificate is recognized as an FAA-approved (or FAA-accepted) document that meets domestic and ICAO standards.⁴

Additionally, the FAA requires that aircraft owners re-register their aircraft every three years, a requirement that was implemented to clean out “dead wood” in the aircraft registration system in 2010 — a problem that was not precipitated by our Members, and for which there should be an exception for Part 121 air carriers.⁵ We previously suggested to the FAA and again urge here the cessation of the three-year renewal requirement.⁶

⁴ See ICAO, Annex 7 (not prohibiting the use of valid copies).

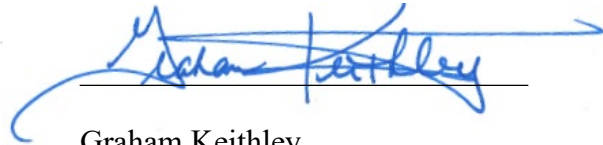
⁵ See Comments of Airlines for America, Docket OST-2017-0069, at 7 (Part Three: Proposal for Repeal or Amendment of Existing FAA and PHMSA Regulations) available at <https://beta.regulations.gov/document/DOT-OST-2017-0069-2750>.

⁶ See *id.* at 8.

The changes would not only reduce burdens on the industry, but also reduce burdens on the FAA. They would also be consistent with the Paperwork Reduction Act and the related U.S. Department of Transportation policies, including minimizing paperwork burdens for individuals, minimizing the cost to the Federal Government, and ensure that information technology is acquired, used, and managed to improve performance of agency missions, including the reduction of information collection burdens on the public, and to increase program efficiency and effectiveness.⁷

We thank the Office of Management and Budget and the FAA for this opportunity to recommend these improvements and look forward to working with the FAA to modernize its aircraft registration system.

Respectfully submitted,



Graham Keithley
Vice President & Associate General Counsel
AIRLINES FOR AMERICA
1275 Pennsylvania Avenue, NW
Suite 1300
Washington, DC 20004
(202) 626-4000

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⁷ See 44 U.S.C. §§ 3501(1), (5), and (10) and DOT Order 1351.29 ¶ 29.4.5 (2017) (CIOP Chapter 1351.29, Paperwork Reduction Act (PRA) and Information Collection (IC)).