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August 15, 2022

Mr. Kevin West Manager, Aircraft Registration Branch, AFB-710 Federal Aviation Administration PO Box 25504 Oklahoma City, OK 73125

Comments submitted electronically: https://www.regulations.gov

RE: Federal Register Docket No. FAA-2022-0828

Dear Mr. West:

The Washington State Department of Transportation appreciates the opportunity to provide comments on the Small Unmanned Aircraft Registration System [Docket No. FAA-2022-0828] issued June 22, 2022. WSDOT offers these comments to the Federal Aviation Administration on the following.

Whether the proposed collection of information is necessary for the FAA's performance

WSDOT views the collection of information for the purpose of Uncrewed Aircraft registration as necessary to enhance the integration of small Uncrewed Aircraft Systems into the National Airspace. This further enhances the FAA's ability to manage a database of sUAS users for the purpose of distributing relevant information that may enhance safety and accountability of drone operations.

The accuracy of the estimated burden

WSDOT believes the estimated burden outlined within the document is reasonably accurate, contingent on the user's level of familiarity and access to the FAA's online based registration site.

Ways for the FAA to enhance the quality, utility, and clarity of the information collection

WSDOT believes making UAS registrant information publicly available and part of the registration program (similar to 14 CFR Part 47 Aircraft Registration) is a necessity to support integration efforts of UAS operations at the state level.

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This capability is currently omitted in the registration program under 14 CFR Part 48 registrations. WSDOT recommends the FAA's Registration Branch mirror the Part 47 Registration Program data sharing capability to the Part 48 Registration Program, thus increasing the utility and use of the sUAS Registration Program. WSDOT currently registers crewed aircraft with the aid of FAA registration data. WSDOT, as of April 1, 2022, also registers commercially used uncrewed aircraft but without the aid of FAA data.

Ways that the burden could be minimized without reducing the quality of the collected information

WSDOT believes the burden associated with the data entry requirements for the registration of sUAS is appropriate for the required data collection elements.

Thank you for your consideration of these comments. If you would like to discuss this issue any further, please contact David Fleckenstein, Director, Aviation Division, at (360) 529-6550 or fleckda@wsdot.wa.gov.

Sincerely,

Sm. m. M.

Roger Millar, PE, FASCE, FAICP

Secretary of Transportation