



August 16, 2022

Mr. Kevin West
Manager
Aircraft Registration Branch
U.S. Federal Aviation Administration
800 Independence Ave. SW
Washington, D.C. 20591

RE: Comments for Airlines for America for Clearance of a Renewed Approval of Information Collection: Small Unmanned Aircraft Registration System

Airlines for America (“A4A”)¹ appreciates the opportunity to provide these Comments in response to the Federal Aviation Administration’s (“FAA”) Request for Comments, which seeks renewed approval to authorize aircraft registration for Small Unmanned Aircraft Systems (“sUAS”) under 49 U.S.C. 44101(a) and 14 C.F.R. part 48.

A4A strongly supports the continued collection of the requested information for sUAS registration. A4A Members have keen safety and security interests associated with the operation of sUAS in controlled airspace. With the U.S. airline industry transporting 2.4 million passengers and more than 58,000 tons of cargo a day, safety must be our top priority. Accordingly, A4A endorses the FAA’s renewed proposal to collect information related to sUAS operation in controlled airspace, and to then utilize this information to implement registration requirements for sUAS in the National Airspace System (“NAS”). This proposal supports aviation safety and security through the FAA’s use of collected information to determine how to implement a sUAS registration process in the NAS.

Required registration promotes safety and supports integrating sUAS into the national airspace system (NAS). The registration creates a level of transparency and accountability among all users of the national airspace. Transparency and accountability are pertinent to maintaining a safe and secure national airspace.

Transparency supports agency and law enforcement action during times of safety and security issues. In the event of said enforcement action, registration creates an efficient identification

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

process. Being able to quickly identify the owner of a sUAS supports responses in the event of threats to the safety of the NAS.

Required registration also promotes equal accountability among all users of the NAS. Registration will prevent careless or even malicious operation of sUAS because owners know they can easily be identified for their actions. Further, required registration supports counter UAS ("C-UAS") efforts to detect and classify malicious use of sUAS. After C-UAS is used to detect sUAS, the FAA will be able to assist in identifying the owner of the drone and not just the drone itself.

Conclusively, it is within the FAA's authority to assess the impacts sUAS have on safety and security within the NAS. In this instance, gathering information regarding the benefits of required registration of sUAS supports the FAA's mission in maintaining a safe and secure national airspace.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Andy Cebula", with a stylized flourish at the end.

Andy Cebula
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