

**BEFORE THE
FEDERAL AVIATION ADMINISTRATION
DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.**

IN THE MATTER OF

**Request for Comments; Clearance of a New Approval of Information
Collection: Federal Aviation Administration (FAA) Unmanned
Aircraft Systems (UAS) Support Center Case Management System
(CMS)**

Docket No. FAA-2021-0466

COMMENTS OF THE SMALL UAV COALITION

**Gregory S. Walden
Dentons US LLP
1900 K Street NW
Washington, DC 20006
*Counsel to the Small UAV Coalition***

August 6, 2021

Filed with www.regulations.gov

**BEFORE THE
FEDERAL AVIATION ADMINISTRATION
DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.**

IN THE MATTER OF

**Request for Comments; Clearance of a New Approval of Information
Collection: Federal Aviation Administration (FAA) Unmanned
Aircraft Systems (UAS) Support Center Case Management System
(CMS)**

Docket No. FAA-2021-0466

COMMENTS OF THE SMALL UAV COALITION

The Small UAV Coalition (“Coalition”)¹ is pleased to provide its comments in support of the new UAS Support Center Case Management System (CMS). The Coalition has long advocated for increased transparency and responsiveness with respect to stakeholder inquiries about exemptions under section 333 of the FAA Modernization and Reform Act of 2012, waivers under 14 C.F.R Part 107, and exemptions under section 44807 of the FAA Reauthorization Act of 2018. The Coalition has also urged the FAA to respect the privacy interests of UAS owners and operators in its promulgation of rules, policies, and guidance. Accordingly, the Coalition supports this new information collection, provided the FAA adopts measures to protect the stakeholder’s name and preferred method of communications (email address or phone number).

From the FAA’s notice, it appears the CMS Customer Inquiry Form will be simple for a stakeholder to complete, with the only questions requiring some time being the subject of the inquiry and the particular inquiry or question. The Coalition believes the estimate of two minutes to complete the form is reasonable, and recommends a prominently displayed link and a simple set of instructions on how to access the form. The Coalition also supports the automated email receipt that will include an inquiry reference number, which the Coalition believes should be sent in real time. The Coalition supports the Customer Inquiry Status Check Form to allow a stakeholder to follow up one or more times if a response is not provided quickly. Finally, the Coalition supports the FAA’s statement that the “respondent may submit any number of inquiries.”

While not within the scope of the request for comments, the Coalition recommends that the FAA CMS include an opportunity for the requester to contact an FAA UAS Support Center Analyst, via a requester service phone line, in circumstances where such a conversation may be needed to refine or explain a stakeholder’s inquiry or to explain the FAA’s response.

¹ Members of the Small UAV Coalition are listed at www.smalluavcoalition.org.

With respect to privacy, the FAA notice explains that a member of the public will be able to check the status of an inquiry by entering the reference number and the email address used when creating the inquiry. The Coalition seeks clarification that a member of the public will not be able to access any inquiry submitted by another. Moreover, the Coalition urges the FAA to commit to protect certain personally identifiable information ("PII") (email address and phone number) in response to a Freedom of Information Act request, under 5 U.S.C. 552(b)(6).

Respectfully submitted,



Gregory S. Walden
Dentons US LLP
1900 K Street NW
Washington, DC 20006
202-496-7436
gregory.walden@dentons.com