



# AIR LINE PILOTS ASSOCIATION, INTERNATIONAL

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October 29, 2024

U.S. Department of Transportation  
Docket Operations M-30  
West Building Ground Floor  
Room W12-140  
1200 New Jersey Avenue SE  
Washington, DC 20590  
**ATTN:** Docket No: FAA-2024-2103

**Subject: Clearance of Renewed Approval of Information Collection: Aircraft Registration**

**IN SUPPORT**

Dear Sir or Madam:

The Air Line Pilots Association, International (ALPA) represents the safety interests of more than 78,000 pilots at 41 U.S. and Canadian airlines. ALPA's long-held position is that all operations in the national airspace system (NAS) must be conducted to a level of safety that does not reduce the safety levels of other NAS users, including airline operations.

ALPA appreciates the opportunity to comment on Clearance of Renewed Approval of Information Collection: Aircraft Registration Docket No: FAA-2024-2103. ALPA understands the following:

The Aircraft Registry has determined the need to create a new form AC Form 8050-88UA. The AC Form 8050-88UA was created to make it easier for registration applicants to supply the FAA Aircraft Registry with the minimal information needed to register Unmanned Aircraft (UA). Most UA owners don't have the required evidence of ownership to register. The affidavit will be used in lieu of a recordable bill of sale for any new registrations. The registrant may still submit any other proof of ownership with the affidavit or declare that evidence of ownership is not available.

**ALPA continues to support** the FAA in information collection, especially when it comes to ensuring proper steps are followed to register all UA. By creating AC Form 8050-88UA the FAA has streamlined a process that was found to be difficult for UA owners to have the required paperwork when it comes to registering their UA in most cases. **ALPA continues to support** the renewal for information collection and the FAA's process for reviewing and analyzing the burden that UA owners may have had under the old process to register UA.

While this may seem burdensome to some applicants trying to navigate the registration process for UAs, this is the only way the FAA can maintain safety oversight over many applicants properly registering their UAs in the National Airspace System (NAS).

**ALPA will continue to support** the FAA and urge them to continue to create alternate methods to ensure proper registration for all UA applicants registering their aircraft. ALPA believes that this is an integral component of NAS safety and security.

In summary, ALPA is in support for Requests for Comments; Clearance of Renewed Approval of Information Collection: Aircraft Registration. Furthermore, ALPA urges the FAA to continue the renewal for approvals of information collection, and to continue to analyze methods to make it even easier for UA owners to register their aircraft.

If you have any questions, please do not hesitate to contact Shea Byom, Engineering and Air Safety, at 703-689-2270 or [Shea.Byom@alpa.org](mailto:Shea.Byom@alpa.org).

Sincerely,

A handwritten signature in blue ink, appearing to read "V. Patterson", with a large, stylized initial "P" at the start.

Captain Vas Patterson  
ADO UAS Director  
Air Line Pilots Association, Int'l