



Airlines for America¹
We Connect the World

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**Re: Comments of Airlines for America Regarding Agency Information
Collection Activities for Small Unmanned Aircraft Registration System
(sUAS) (FAA-2019-0333)**

Airlines for America ("A4A"), on behalf its Members,¹ submits the following comments regarding the Federal Aviation Administration's ("FAA") Agency Information Collection Activity for Small Unmanned Aircraft Registration System.² Our Members have safety and security interests in the Safety Statement because of their substantial operations in the National Airspace System ("NAS") where small unmanned aircraft systems ("sUAS") operate. sUAS registration is not only necessary for the FAA to ensure safety and efficiency of the NAS,³ but also a critical component to FAA's plans to further integrate sUAS into the NAS, most especially with remote identification.

We agree with the FAA that sUAS registration "is *necessary* to ensure personal accountability among all users of the [NAS]," especially to identify non-compliant owners and operators.⁴ Moreover, the FAA has proposed additional rulemakings to expand sUAS flights into the NAS that increase the risk to other airspace users and people on the ground, including flights over people and at night.⁵ The FAA does not intend to finalize these expansion of sUAS flights until it finalizes its policy concerning remote identification of sUAS.⁶ As the UAS Identification and Tracking (UAS ID) Aviation Rulemaking Committee (ARC) explained, "[t]he FAA . . . would need to maintain the registration database and PII system for *all solutions*."⁷ Given the relative ease of sUAS

¹ A4A's members are Alaska Airlines, Inc.; American Airlines Group, Inc.; Atlas Air, Inc.; 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.

² See 84 Fed. Reg. 20,460 (May 9, 2019) (hereinafter "sUAS Registration Notice").

³ See 49 U.S.C. § 40101(d)(4).

⁴ See sUAS Registration Notice, 84 Fed. Reg. 20,460 (emphasis added).

⁵ See FAA, Notice of Proposed Rulemaking, Operation of Small Unmanned Aircraft Systems Over People, 84 Fed. Reg. 3,856 (Feb. 13, 2019) (hereinafter "NPRM for sUAS Flights Over People"); FAA, Advance Notice of Proposed Rulemaking, Safe and Secure Operations of Small Unmanned Aircraft Systems (Feb. 13, 2019).

⁶ See NRM for sUAS Flights Over People, 84 Fed. Reg. 3,861.

⁷ See UAS Identification and Tracking (UAS ID) Aviation Rulemaking Committee (ARC), ARC Recommendations Final Report at 20 (Sept. 30, 2017) (emphasis added). See also *id.* at 39, note 18 ("The ARC recommends that the FAA reconcile the requirements for UAS ID and tracking with the requirements for UAS registration to ensure that information necessary to support the PII System is appropriately available.")

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registration though FAA's online portal compared to the burdensome legacy paper registration system for manned aircraft, the benefits—current and future—of sUAS registration far outweigh the costs on sUAS owners and operators.

In sum, we stress the need and importance of sUAS registration for current compliance oversight and future integration of sUAS into the NAS. We appreciate the opportunity to submit these comments and thank you for your consideration.

Respectfully submitted,



Andy Cebula

Vice President, NextGen and New Entrants
AIRLINES FOR AMERICA