



September 5, 2019

VIA ELECTRONIC SUBMISSION

Re: Docket No. FAA-2019-0630
Clearance of New Approval of Information Collection: Privacy International Civil Aviation Organization (ICAO) Address Program

Dear U.S. Department of Transportation,

As the Founder and CEO of FlightAware, a Houston-based digital aviation company that provides operational flight tracking services to the operators of over 15,000 business aviation aircraft, I am writing in support of the proposed Privacy ICAO Address Program.

For over 20 years, the FAA has operated a program (commonly referred to as "BARR") to restrict the distribution of flight data upon request from an owner or operator of an aircraft. Until recently, this program was largely effective at addressing security and privacy concerns. However, it has been decreasingly effective in recent years due to technology changes such as the advent of ADS-B and the proliferation of hobbyist web sites designed specifically for the primary purpose of disseminating flight data for aircraft that leverage the FAA's BARR privacy and security program. As a result, aircraft operators are forced to deal with concerns about the security and privacy of their flights.

The fundamental problem is that when an aircraft's transponder emits positional data, it includes an identifier (the "ICAO Mode S code") that is uniquely associated with that aircraft. That unique association coupled with minimal research can reveal the identities of specific people on the aircraft. This is clearly a security and personal privacy concern. The proposed privacy program would enable aircraft operators to receive an alternate ICAO Mode S code which would allow aircraft to be safely tracked by air traffic control, other airplanes in the national airspace system, and ADS-B receivers, but the identity of each aircraft would only be known to the FAA.

This program, as proposed, would solve the problem and only create minimal burden for the FAA. Aircraft configuration and compliance would be at the expense of aircraft operators, who could weigh that burden against their security and privacy concerns. Importantly, this proposal would have no negative safety implications for the air traffic control system, and at the same time, enhance security and personal privacy protections commensurate with prior FAA initiatives, such as BARR.

FlightAware strongly supports this program and will aid both the FAA and aircraft operators in its successful implementation.

Sincerely,

Daniel A. Baker
Chief Executive Officer
FlightAware

