



**U.S. Department of Transportation**  
**Privacy Impact Assessment**  
**Federal Aviation Administration (FAA)**  
**Aviation Safety (AVS)**

**Federal Aviation Administration DroneZone**  
**(FAADroneZone)**

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## Executive Summary

The Federal Aviation Administration's DroneZone (FAADroneZone) is a solution specifically created to improve the customer experience and provide a single sign-on platform for the following services and any services that may be added in the future:

- Small Unmanned Aircraft System Registration System (sUASRS);
- Small Unmanned Aircraft System (sUAS) Part 107 Waiver and/or Airspace Authorization (Part 107 Waiver Authorization) requests;
- sUAS Part 107 Accident Reporting (Part 107 Accident Reporting);
- FAA Recognized Identification Area (FRIA);
- Community Based Organizations (CBO);
- Certificate of Authorization DroneZone (CADZ); and
- Notice of Identification (NOI).

The FAADroneZone requires account creation and authentication and provides stakeholders access to FAADroneZone services. Stakeholders include drone owners, drone operators, educational institutions, community-based organizations, and drone proponents. Additionally, the FAADroneZone provides a dashboard to authenticated users showing relevant information regarding submissions made to the FAA for regulated sUAS activities. Information provided may include a list of registered sUAS, status of waivers, authorizations, accident reports, operational guidance, or other services available on the platform. The FAADroneZone allows the FAA to group all of the sUAS back-end services used to manage the FAA's engagement of sUAS within the National Airspace (NAS).

The FAA previously published the Unmanned Aircraft Systems Management Environment (UASME) Privacy Impact Assessment (PIA)<sup>1</sup> on January 5, 2018. In accordance with the E-Government Act, the FAA is updating the PIA because FAADroneZone collects personally identifiable information (PII) from members of the public. The update reflects a name change of the PIA to FAADroneZone and other program and legislative updates. This PIA covers FAADroneZone only.<sup>2</sup> The services available on the FAADroneZone are discussed in the applicable PIA appendices to this PIA and can be found associated with this document on the [Department of Transportation's PIA page](#). Additional services may be

<sup>1</sup>The UASME PIA can be found on DOT's PIA page [here](#).

<sup>2</sup>The small unmanned aircraft registration system provisions can be found in the 2015 [Aircraft Registration PIA](#).



added to the FAA Drone Zone in the future, and if required, a PIA appendix will be added to address all privacy concerns for individual services.

## What is a Privacy Impact Assessment?

*The Privacy Act of 1974 articulates concepts for how the federal government should treat individuals and their information and imposes duties upon federal agencies regarding the collection, use, dissemination, and maintenance of personally identifiable information (PII). The E-Government Act of 2002, Section 208, establishes the requirement for agencies to conduct privacy impact assessments (PIAs) for electronic information systems and collections. The assessment is a practical method for evaluating privacy in information systems and collections, and documented assurance that privacy issues have been identified and adequately addressed. The PIA is an analysis of how information is handled to—i) ensure handling conforms to applicable legal, regulatory, and policy requirements regarding privacy; ii) determine the risks and effects of collecting, maintaining and disseminating information in identifiable form in an electronic information system; and iii) examine and evaluate protections and alternative processes for handling information to mitigate potential privacy risks.<sup>3</sup>*

*Conducting a PIA ensures compliance with laws and regulations governing privacy and demonstrates the DOT's commitment to protect the privacy of any personal information we collect, store, retrieve, use and share. It is a comprehensive analysis of how the DOT's electronic information systems and collections handle personally identifiable information (PII). The goals accomplished in completing a PIA include:*

- *Making informed policy and system design or procurement decisions. These decisions must be based on an understanding of privacy risk, and of options available for mitigating that risk;*
- *Accountability for privacy issues;*
- *Analyzing both technical and legal compliance with applicable privacy law and regulations, as well as accepted privacy policy; and*
- *Providing documentation on the flow of personal information and information requirements within DOT systems.*

*Upon reviewing the PIA, you should have a broad understanding of the risks and potential effects associated with the Department activities, processes, and systems described and approaches taken to mitigate any potential privacy risks.*

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<sup>3</sup>Office of Management and Budget's (OMB) definition of the PIA taken from guidance on implementing the privacy provisions of the E-Government Act of 2002 (see OMB memo of M-03-22 dated September 26, 2003).



## Introduction & System Overview

In 2012, Congress passed the FAA Modernization and Reform Act of 2012 ([Public Law 112-95](#)). Section 333 of Public Law 112-95 directed the Secretary of Transportation to determine which types of unmanned aircraft systems (UAS) because of their size, weight, speed, operational capability, proximity to airports and populated areas, and operation within visual line of sight, did not create a hazard to users of the national airspace system (NAS) or the public, or pose a threat to national security.

Based on such determinations, the statute mandated the FAA to establish requirements for the safe operation of the UAS in the NAS.

The FAA issued the [Operation and Certification of Small Unmanned Aircraft Systems final rule](#) on June 28, 2016, to enable certain small Unmanned Aircraft System (sUAS) operations to commence upon adopting this rule and accommodate technologies as they evolve and mature. In order to implement the requirements of the final rule, the initial support system for sUAS operations and activities resulted in systems that were not integrated and could not readily share data. As a result, users were required to log into multiple services and provide redundant data in order to submit information necessary for the FAA to authorize sUAS operations.

The 2018 FAA Reauthorization Act (P. L. 115-254) repealed Section 333, which was replaced with [Section 44807](#). Section 44807 directs the Secretary of Transportation to determine whether UAS operations posing the least amount of public risk and no threat to national security could safely be operated in the NAS and if so, to establish the requirements for the safe operation of these systems in the NAS.

Subsequently, the FAA developed the FAADroneZone, a public-facing web portal that houses the following services, which are subject to UAS oversight and provision, and any services that may be added in the future: Small Unmanned Aircraft System Registration, the sUAS Part 107 Waiver and/or Airspace Authorization (Part 107 Waiver Authorization) requests, and sUAS Part 107 Accident Reporting (Part 107 Accident Reporting), FAA Recognized Identification Area (FRIA), Community Based Organizations (CBO), Certificate of Authorization DroneZone (CADZ), and Notice of Identification (NOI). See PIA appendices associated with this PIA document, which address the privacy risks posed by current and any future services on the [Department of Transportation's PIA page](#).

The FAADroneZone was created to improve the customer experience and provide a single sign-in platform for FAA to engage with sUAS stakeholders for sUAS services. sUAS



owners or operators, whether flying under § 44809, Part 107, or flying sUAS over 55 lbs., interact with the FAA and obtain guidance to operate within the rules and regulations of the NAS. The FAADroneZone facilitates account creation and authentication and provides access to the stakeholders to the FAADroneZone services available in the FAADroneZone. Additionally, users are provided a dashboard showing their information, which could include their registered sUAS information, the status of all services submitted for waivers, authorizations and accident reports, and operation guidance. With the FAADroneZone, sUAS registration data previously entered by the user is stored securely using encryption technology and then is used to automatically prepopulate applicant forms, thus increasing the speed and accuracy of requests.

*Create a FAADroneZone Account:*

FAA employees and FAA contractors access FAADroneZone using their personal identification verification (PIV) cards.

A stakeholder must first create an account to access the FAADroneZone services and provide a user name, which is their e-mail address and create a password, both of which are stored in the FAADroneZone. The FAA sends a verification e-mail to the e-mail address provided by the registrant that includes a link to the FAADroneZone landing page. Account registration is complete once the validation link is clicked and the account is activated. Once a registrant has activated their FAADroneZone account, they can use any FAADroneZone services.

A stakeholder is not required to create a FAADroneZone account to see guidance for registering as an owner who flies Model Aircraft under § 44809 and/or as an owner who flies sUAS under Part 107. In addition, they can open links to more information about flying an sUAS device, becoming an sUAS pilot, registering a UAS over 55lbs., and viewing privacy statements, web policies, other government sites, and other government sites contacts.

After the stakeholder creates their account, they may register under §44809 or Part 107. Registration activities are discussed in the FAA's 2015 [Aircraft Registration PIA](#).

*Registering to Fly a Model Aircraft under § 44809:*

Registrants choosing to fly under [§ 44809](#) will select the “Fly a Model Aircraft under §44809” option and provide their model aircraft registration information. Once registration is complete, the registration information is displayed on the dashboard within the



FAADroneZone. The dashboard displays their sUAS name and address provided during FAADroneZone account creation, instructions on marking their sUAS, and safety guidance. The dashboard also provides convenient printing, e-mailing, and cancellation of their sUAS registration. The safety guidance provides safety parameters for flying under 49 USC 44809: Exception for limited recreational operations of unmanned aircraft.

*Registering to Fly a sUAS under Part 107:*

Registrants choosing to fly under [Part 107](#) must register their sUAS by using the Part 107 dashboard. Once completing registration, they may submit a request for a Part 107 Waiver or Authorization, file an accident report, and/or review the status of their sUAS in the dashboard.

The FAADroneZone retrieves data from the registration, Part 107 Waiver or Authorization, and Part 107 Accident Reporting back-end services and displays the owner's information and number of sUAS registered, the number of organizational users, status of past and current Part 107 Waivers and Authorizations requests, and submitted Part 107 Accident Reports in the dashboard.

This FAADroneZone PIA covers the FAADroneZone services with the exception of sUAS registration. For a full discussion of the individual FAADroneZone services, see the applicable PIA appendices associated with this PIA.

### **Fair Information Practice Principles (FIPPs) Analysis**

*The DOT PIA template is based on the fair information practice principles (FIPPs). The FIPPs, rooted in the tenets of the Privacy Act, are mirrored in the laws of many U.S. states, as well as many foreign nations and international organizations. The FIPPs provide a framework that will support DOT efforts to appropriately identify and mitigate privacy risk. The FIPPs-based analysis conducted by DOT is predicated on the privacy control families articulated in the Federal Enterprise Architecture Security and Privacy Profile (FEA-SPP) v3, sponsored by the National Institute of Standards and Technology (NIST), the Office of Management and Budget (OMB), and the Federal Chief Information Officers Council and the Privacy Controls articulated in Appendix J of the NIST Special Publication 800-53 Security and Privacy Controls for Federal Information Systems and Organizations.*

### **Transparency**

*Sections 522a(e)(3) and (e)(4) of the Privacy Act and Section 208 of the E-Government Act require public notice of an organization's information practices and the privacy impact of*



*government programs and activities. Accordingly, DOT is open and transparent about policies, procedures, and technologies that directly affect individuals and/or their personally identifiable information (PII). Additionally, the Department should not maintain any system of records the existence of which is not known to the public.*

The FAA deploys multiple techniques to ensure that individuals are informed of the purpose for which the FAA collects, uses, disseminates, and retains PII within the FAADroneZone. The FAADroneZone maintains records on stakeholders, which are retrievable by e-mail address. Please see the associated PIA appendices for further explanation of each FAADroneZone service.

The Department of Transportation (DOT) has published the following Privacy Act System of Records Notice (SORN), providing notice to the public of its privacy practices regarding the collection, use, sharing, safeguarding, maintenance, and disposal of information about an individual that may be collected.

- DOT/ALL 13, *Internet/Intranet Activity and Access Records*, May 7, 2002, 67 FR 30757 – provides notice to stakeholders of records of system access.

This SORN addresses only the information collected when creating an account and does not cover the FAADroneZone services. Each FAADroneZone service is covered by a Privacy Act notice specific to that service and is identified as part of the application in its specific PIA appendix associated with this document.

As required by law, a Privacy Act statement discussing the Department's privacy practices regarding the collection, use, sharing, safeguarding, maintenance, and disposal of PII is publicly available on the FAADroneZone landing page. Individuals must acknowledge that they have read and understood the statement, including all the terms and conditions of using the system, before providing any information to create an account.

The re-publication of this PIA further demonstrates DOT's commitment to providing appropriate transparency.

### **Individual Participation and Redress**

*DOT provides a reasonable opportunity and capability for individuals to make informed decisions about the collection, use, and disclosure of their PII. As required by the Privacy Act, individuals should be active participants in the decision-making process regarding the*



*collection and use of their PII and they are provided reasonable access to their PII and the opportunity to have their PII corrected, amended, or deleted, as appropriate.*

All information within the FAADroneZone services is voluntarily collected from the stakeholder. To facilitate access to the FAADroneZone and services hosted on the FAADroneZone, the e-mail address and password are collected and used to create their account. A verification e-mail will be sent to the e-mail address provided by the sUAS stakeholder, where the stakeholder may edit their e-mail address or change their password as needed. Please see the PIA appendices associated with the specific FAADroneZone services for collection, use, and disclosure of the PII.

Under the provisions of the Privacy Act, individuals may request searches to determine if any records that may pertain to them have been added. Individuals wishing to know if their records appear in this system may inquire in person or in writing to:

Federal Aviation Administration  
Privacy Office  
800 Independence Ave., South West (SW)  
Washington, District of Columbia (DC) 20591

Included in the request must be the following:

- Name
- Mailing address
- Phone number and/or e-mail address
- A description of the records sought, and if possible, the location of the records

Contesting record procedures: Individuals wanting to contest information about themselves that is contained in this system should make their requests in writing, detailing the reasons for why the records should be corrected to the following address:

Federal Aviation Administration  
Privacy Office  
800 Independence Ave. SW  
Washington DC, 20591



Additional information about the Department's privacy program may be found at [www.transportation.gov/privacy](http://www.transportation.gov/privacy). Individuals may also contact the DOT Chief Privacy Officer at [privacy@dot.gov](mailto:privacy@dot.gov).

## **Purpose Specification**

*DOT should (i) identify the legal bases that authorize a particular PII collection, activity, or technology that impacts privacy; and (ii) specify the purpose(s) for which it collects, uses, maintains, or disseminates PII. The PII contained in PTB is utilized for transit subsidy usage reconciliation, reporting for the agency, monitoring, and tracking participant usage.*

Data in the system of records (usernames, emails, and passwords) is used by DOT systems and security personnel or persons authorized to assist these personnel, to plan and manage systems services and otherwise perform their official duties. Such services would include but are not limited to, analyzing engineering and statistical use data to assist in making business decisions regarding upgrading hardware, software, and communications technology to meet changing Internet/Intranet use requirements. The system is also used to monitor for improper use.

The following authorities are applicable to the FAADroneZone and all FAADroneZone services:

- 49 U.S.C. § 106(f), Authority of the Secretary and the Administrator
- 49 U.S.C. § 106(g), Duties and powers of Administrator
- 49 U.S.C. § 40101, Policy
- 49 U.S.C. § 40103, Sovereignty and use of airspace
- 49 U.S.C. § 40106, Emergency powers
- 49 U.S.C. § 40113, Administrative
- 49 U.S.C. § 44701, General requirements
- 49 U.S.C. § 46308, Interference with air navigation

For the purpose of user authentication, FAADroneZone receives the email addresses of FAA employees and contractors from MyAccess, an internal FAA system.



## Data Minimization & Retention

*DOT should collect, use, and retain only PII that is relevant and necessary for the specified purpose for which it was originally collected.*

Individuals creating accounts with the FAADroneZone are responsible for the accuracy of the information they provide during the process. The e-mail address and password collected for FAADroneZone account registration are the minimum required to establish unique accounts within the system, ensure appropriate access to services, and maintain communications with registered individuals.

The FAADroneZone account information will be retained and disposed of in accordance with National Archives and Records Administration, [General Records Schedule \(GRS\) 3.2, Information Systems Security Records](#), September 2016, Item 030: System Access Records. An individual's system access records are maintained in DronzeZone as temporary records and are destroyed when business use ceases. Please see the associated PIA appendices for a full discussion of the minimization and retention policy for records related to the individual FAADroneZone services.

## Use Limitation

*DOT shall limit the scope of its PII use to ensure that the Department does not use PII in any manner that is not specified in notices, incompatible with the specified purposes for which the information was collected, or for any purpose not otherwise permitted by law.*

The sharing of FAADroneZone account registration and user activity logs in the FAADroneZone, is conducted in accordance with Department [SORN DOT/ALL 13, Internet/Intranet Activity and Access Records](#), May 7, 2002, 67 FR 30758. In addition to other disclosures generally permitted under 5 U.S.C. § 552a(b) of the Privacy Act, all or a portion of the records or information contained in this system may be disclosed outside DOT as a routine use pursuant to 5 U.S.C. § 552a(b)(3) as follows:

- To provide information to any person(s) authorized to assist in an approved investigation of improper access or usage of DOT computer systems.
- To an actual or potential party or his or her authorized representative for the purpose of negotiation or discussion of such matters as settlement of the case or matter, or informal discovery proceedings.
- To contractors, grantees, experts, consultants, detailees, and other non-DOT employees performing or working on a contract, service, grant cooperative



agreement, or other assignment from the Federal government, when necessary to accomplish an agency function related to this system of records.

- To other government agencies where required by law.

The Department has also published 15 additional routine uses applicable to all DOT Privacy Act systems of records. These routine uses are published in the Federal Register at [75 FR 82132](#), December 29, 2010, and [77 FR 42796](#), July 20, 2012, under ‘‘Prefatory Statement of General Routine Uses.’’ Sharing of Privacy Act records collected, used, and maintained as part of the back-end services is discussed in the associated appendices for the back-end services.

### Data Quality and Integrity

*In accordance with Section 552a(e)(2) of the Privacy Act of 1974, DOT should ensure that any PII collected and maintained by the organization is accurate, relevant, timely, and complete for the purpose for which it is to be used, as specified in the Department’s public notice(s).*

Registrants are responsible for ensuring the accuracy of their e-mail address and password when they create their FAADroneZone account. Once the account is complete, individuals may log into the system and change/update their e-mail address and password as needed.

The data quality and integrity needs of the FAADroneZone services are discussed in the applicable PIA appendices.

### Security

*DOT shall implement administrative, technical, and physical measures to protect PII collected or maintained by the Department against loss, unauthorized access, or disclosure, as required by the Privacy Act, and to ensure that organizational planning and responses to privacy incidents comply with OMB policies and guidance.*

The FAA protects PII with reasonable security safeguards against loss or unauthorized access, destruction, usage, modification, or disclosure. These safeguards incorporate standards and practices required for federal information systems under the Federal Information Security Management Act (FISMA) and are detailed in Federal Information Processing Standards (FIPS) Publication 200, Minimum Security Requirements for Federal Information and Information Systems, dated March 2006, and National Institute of Standards and Technology (NIST) Special Publication (SP) 800-53, Revision 4, Security and Privacy Controls for Federal Information Systems and Organizations, dated April 2013.



The FAADroneZone services have a built-in time-out function, and stakeholders are automatically logged out after 30 minutes of non-activity. In addition, all FAADroneZone services securely transmit information provided by the stakeholders using third-party authentication services, which protect the data using Hypertext Transfer Protocol encrypted by Transport Layer Security/Secure Sockets Layer. The FAADroneZone services are hosted in Amazon Web Services (AWS) United States East/West Public Cloud, which is a Federal Risk and Authorization Management Program Compliant Cloud Service Provider, meeting Moderate Federal Risk and Authorization Management Program security requirements. AWS received its Authority to Operate from the U.S. Department of Health and Human Services on August 2013. The FAADroneZone was authorized to operate on May 16, 2022.

### **Accountability and Auditing**

*DOT shall implement effective governance controls, monitoring controls, risk management, and assessment controls to demonstrate that the Department is complying with all applicable privacy protection requirements and minimizing the privacy risk to individuals.*

FAA Order 1370.121B implements the various privacy requirements of the Privacy Act of 1974 (the Privacy Act), the E-Government Act of 2002 (Public Law 107-347), the FISMA, DOT privacy regulations including DOT Privacy Risk Management Policy Order 1351.18, Office of Management and Budget (OMB) mandates, and other applicable DOT and FAA information and information technology management procedures and guidance.

In addition to these practices, additional policies and procedures will be consistently applied, especially as they relate to access, protection, retention, and destruction of PII. Federal and contract employees are given clear guidance in their duties as they relate to collecting, using, processing privacy data. Guidance is provided in the form of mandatory annual security and privacy awareness training, as well as FAA Order 1370.12.1B. The FAA will conduct periodic privacy compliance reviews of the FAADroneZone services relative to the requirements of OMB Circular A-130.

### **Responsible Official**

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### **Approval and Signature**

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DOT Privacy Office - Approved - 06 01 2023