



## Appendix B: Certificate of Authorization (COA) Application in FAADroneZone (CADZ)

### Executive Summary

The Certificate of Authorization (COA) Application in FAADroneZone (CADZ) is a web-based application that provides an interactive online application process to request a Certificate of Waiver or Authorization (COA) for a specific flight operation by a proponent, hereafter referred to as the applicant. The Air Traffic Organization (ATO) initially developed the Certificate of Authorization (COA) Application Processing System (CAPS) to meet the requirements of the [Federal Aviation Administration \(FAA\) Reauthorization Act of 2018, Pub. L. 115-254 Section 44807](#), Special Authority for Certain Unmanned Aircraft Systems, directs the FAA to safely integrate unmanned aircraft systems (UAS) into the National Airspace System (NAS). The legacy CAPS was never fully developed, requires functionality that requires user workarounds, and did not meet the requirements. The CADZ was developed as a replacement.

The CADZ is part of the FAADroneZone services. This is an Appendix to the overarching PIA for FAADroneZone located at <https://www.transportation.gov/individuals/privacy/faadronezone-0>.

### Introduction & System Overview

A COA is an authorization issued by the ATO to a civil<sup>1</sup> or public operator<sup>2</sup> for a specific unmanned aircraft (UA) activity. After submitting a COA application, the FAA conducts a comprehensive operational and technical review. If necessary, provisions or limitations may be imposed as part of the approval to ensure the UA can operate safely with other airspace users. In most cases, the FAA provides a formal response by email within 60 business days from the time of submission. CADZ provides an interactive online application process to request a COA for a specific flight operation. CADZ process consists of four primary processes: workflow model, application, review of the application, and COA report processes.

#### *Workflow Model*

CADZ utilizes a workflow model to automate submitting and approving a COA application from its initial draft stage to its final stage. The workflow model provides detailed

<sup>1</sup> Civil operators who submit COAs through CADZ consist of those who operate UAS under the provisions of 14 CFR Part 91.

<sup>2</sup> Public aircraft operators that submit COAs through CADZ consist of government agencies, law enforcement, and public safety entities as defined in 49 U.S.C. § 40102(a)(41).



information on each stage of the COA application, review, and approval process to automate the FAA's ability to track each application's status, monitor progress, and take appropriate steps to ensure process deadlines are met. It also defines who is responsible for and assigned to each step of the process. The workflow will track the COA application as it progresses through the workflow and track data related to that application, such as who the application was assigned to and how long it has been in each stage of the application process.

Additionally, CADZ will allow applicants/applicants to manage existing COA applications, start or cancel a new COA application, review the status of a previously submitted COA application, and submit reporting for a COA.

### ***Application***

An applicant enters their name, address, email address, and phone number when completing the *Application for Certificate of Waiver or Authorization*<sup>3</sup> in CADZ. CADZ generates a unique numerical draft number that tracks the application prior to its submission. Once the applicant enters their contact information, they must acknowledge several statements called Declarations. The Declarations section requires *Yes* or *No* responses from the applicant that certifies or declares their type of operation and associated authorization. Applicants are also required to upload an approved Public Declaration Letter (PDL)<sup>4</sup> to CADZ that does not contain any additional personally identifiable information (PII) that was not previously captured during the application phase. The CADZ will not allow the applicant to continue with the application until an approved PDL is uploaded.

The COA application also collects information about the requested operation, flight operations area/plan, UAS specifications, and any flight crew qualifications. Some of the web form questions include free-form text fields; however, none of these fields request or require additional PII. The COA application requires the applicant to include the following information:

- **Operational Description:** Overview of the proposed UAS activities to include the identification of the operating location (controlled and/or uncontrolled airspace), Visual Flight Rules (VFR)/Instrument Flight Rules (IFR) operations, request for a night and light out operations, and an executive and operational summary of planned UAS activities.

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<sup>3</sup> In rare instance, an applicant submits a paper application mail applicant using the FAA Form 7711-2 *Application for Certificate of Waiver or Authorization*. The information is manually entered into CADZ and processed the same as the electronic application.

<sup>4</sup> The public declaration letter is provided to the FAA and must represent the understanding to the parties that are submitting the declaration letter that they are qualified to operate as a public aircraft operator, that the operations they are conducting meet the definition of a governmental function, and that the operations conducted as a public aircraft operator are not for commercial (compensation or hire) purposes.



- **UAS Platform Specifications:** Information about the UAS platform to include performance characteristics, airworthiness certificate or declaration, lost link mission procedures, lost communication procedures, emergency procedures, aircraft lighting, spectrum analysis approval, ATC communications capability, electronic surveillance capability, and aircraft performance recording.
- **Visual Surveillance Methods and Procedures:** Description of the visual capability of the UAS operator to maintain visual contact with the UAS and a description of the resources to be utilized to maintain visual contact with the UAS and surrounding airspace.
- **Flight Operations Area/Plan:** Geographic location of the requested operation.
- **Flight Aircrew Qualifications:** Series of Yes or No radio buttons and free text fields to identify any relevant information regarding the training or certification of the aircrew, medical certification and duty time restrictions.
- **Special Circumstances Description:** Amplifying information that may be helpful in determining the feasibility of the operation.

### ***Review of Application***

The applicant submits their COA application, and CADZ generates a unique COA number that tracks the application throughout the COA process. CADZ automatically sends an email notification to the appropriate COA Processor informing them of the applicant's submission. The COA Processor then logs into FAADroneZone using their Personal Identification Verification (PIV) card to access CADZ. The COA Processor reviews the application for completeness and ensures that all required attachments are included<sup>5</sup>. The COA Processor works with the applicant to clarify or correct inconsistencies in the application and can return the application to the applicant for modification if required.

Once the review is complete, the application is approved or disapproved. If approved, the COA is granted, becomes active, and a signed PDF copy is sent to the applicant. If disapproved, the COA processor sends a disapproval letter stating the reason for the disapproval. The COA application and all relevant documentation are stored in CADZ.

### ***COA Reports***

Special Provisions of the COA specify that applicants must comply with certain reporting requirements. The reporting requirements are:

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<sup>5</sup> Attachments may also include contingency procedures in the case of loss of communication or loss of link with UAS; spectrum analysis and airworthiness document to speak of what is required or documents to help support their application or to explain the operation. The documents do not include PII.



- (1) Documentation of all operations associated with UAS activities is required regardless of the airspace in which the UAS operates.
- (2) The Applicant must submit the number of flights, on a monthly basis, through CADZ.

To meet the reporting requirements, applicants submit their monthly UAS reports in CADZ by selecting the Create Report for Public/Civil COA link from the CADZ dashboard. Reports are manually submitted by the applicant using the functionality provided in CADZ. As part of the COA report an applicant provides the applicant's name, address and phone number. COA report also collects information about the aircraft, operating hours, flight information (e.g., flight date, aircraft operational hours, Ground Control Stations (GCS) hours, pilot duty time per Pilot in Charge (PIC), location city/name, latitude, longitude, and number of flights at location). Additionally, the COA report application requests lost communication events, equipment malfunctions, lost link events, deviations, take-off/landing damage, and a description of any other operational/coordination issues which occurred during the month. Once the report is complete, the applicant submits it to the FAA. Some web form questions include free-form text fields; however, none specifically request or require additional PII from the applicant. These reports are used for trend analysis and review of approved COAs by various parameters collected in the application, such as type of operations, aircraft type, etc.

### **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<sup>6</sup>, 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<sup>7</sup>.*

### **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*

<sup>6</sup> <http://www.cio.gov/documents/FEA-Security-Privacy-Profile-v3-09-30-2010.pdf>

<sup>7</sup> [http://csrc.nist.gov/publications/drafts/800-53-Appendix-J/IPDraft\\_800-53-privacy-appendix-J.pdf](http://csrc.nist.gov/publications/drafts/800-53-Appendix-J/IPDraft_800-53-privacy-appendix-J.pdf)



*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.*

FAA uses multiple methods to ensure applicants are aware of the procedures for submitting a COA application and the purposes for which the agency collects and maintains PII in support of CADZ. A Privacy Act Statement discussing the Department's privacy practices regarding the collection, use, sharing, safeguarding, maintenance, and disposal of PII is presented to the applicant before the FAA collects any information. Public outreach includes but is not limited to websites, emails, phone calls, and online meeting forums used as a means of communication. FAA holds public forums, webinars, and an annual FAA UAS Symposium, where information is provided on authorizations, waivers, and relevant processes. Along with public outreach, the FAA's UAS website (<https://www.faa.gov/uas/>) is the central point for UAS stakeholders to obtain UAS information, including frequently asked questions that speak to UAS requirements, policies, and regulations. The FAA adheres to FAA Order 7200.23, Processing of Unmanned Aircraft Systems Requests, and FAA Order 7210.3, Facility Operation and Administration, which provide policy and guidelines for the approval or denial of a COA. These orders are publicly available on [FAA's website](#).

CAPZ retrieves records by an individual's name and other personal identifiers. Therefore, COAs submitted by individuals (as opposed to entities, or individuals on behalf of entities) are covered under the Privacy Act of 1974. The FAA processes Privacy Act records by the following published system of records notices (SORN): [DOT/FAA 854 - Small Unmanned Aircraft Systems \(sUAS\) Waivers and Authorizations](#), 84 FR 32512 (July 8, 2019). SORN DOT/FAA 854 currently provides notice to the public of FAA's privacy practices regarding the collection, use, sharing, safeguarding, maintenance, and disposal of information related to waivers and authorizations. Lastly, the FAA's publication of this PIA demonstrates DOT's commitment to providing appropriate transparency into the CADZ Program.

### **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.*

CAPZ collects information directly from the individual to process the COA applications. This information is editable by the applicant under the user profile section. Under the provisions of the Privacy Act, individuals may request searches to determine if any records



have been added that may pertain to them. 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 Avenue, S.W.  
Washington, DC 20591

The following information must be included in the request:

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

Individuals wanting to contest information about them 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 Avenue, S.W.  
Washington, DC 20591

### **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.*

CAPZ collects the applicant's name, email, physical address, and phone number for the purpose of processing the applicant's request for a COA. CAPZ generates a unique number that tracks the application before its submission and a unique COA Number that tracks the application after its submission. The FAA collects and maintains the information under the authority of the [Federal Aviation Administration \(FAA\) Reauthorization Act of 2018, Pub. L. 115-254 Section 44807, Special Authority for Certain Unmanned Aircraft Systems](#), which directs the FAA to integrate UAS safely into the NAS.

CADZ does receive or send PII to any internal or external systems.





## 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.*

The FAA collects the minimum information necessary to process a COA request. Records maintained in CADZ are pending approval of retention schedule DAA-0237-2021-0029 from the National Archive Records Administration (NARA). The FAA is proposing to retain these records three years after the cutoff. FAA will maintain the records indefinitely until NARA has approved the applicable schedule.

## 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 FAA maintains the CADZ application in accordance with the Department's system of records notice [DOT/FAA 854 - Small Unmanned Aircraft Systems \(sUAS\) Waivers and Authorizations](#), 84 FR 32512 (July 8, 2019). 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 according to 5 U.S.C. § 552a (b) (3) as follows:

1. To the public, waiver applications and decisions, including any history of previous, pending, existing, or denied requests for waivers applicable to the sUAS at issue for purposes of the waiver, and special provisions applicable to the sUAS operation that is the subject of the request. Email addresses and telephone numbers will not be disclosed pursuant to this Routine Use. Also, airspace authorizations the FAA issues will not be disclosed pursuant to this Routine Use, except to the extent that an airspace authorization is listed or summarized in the terms of a waiver.
2. To law enforcement, when necessary and relevant to an FAA enforcement activity.
3. Disclose information to the National Transportation Safety Board (NTSB) in connection with its investigation responsibilities.

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."



## 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). TRANSevere's WebApplicaition has it's own internal process for ensuring that the correct types of info are inputted such as only letters included in name fields and not numbers etc.*

CAPZ collects information from the applicant, who can review it and is responsible for the accuracy of the information when submitting a COA application. Once a COA application is submitted, the COA Processor reviews the application for completeness and ensures that all required attachments are included. The COA Processor contacts the applicant as needed to correct inconsistencies in the application. For inconsistencies found in an issued COA, the applicant will need to contact the COA Processor to update the issued COA application.

## 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 FAA DroneZone services relative to the requirements of OMB Circular A-130.

## Responsible Official

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## Approval and Signature

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