



Appendix C - Small Unmanned Aircraft System (sUAS) Part 107 Waiver and Airspace Authorization Application

Executive Summary

The small Unmanned Aircraft System (sUAS) Part 107 Waiver and/or Airspace Authorization application service offered under [FAADroneZone](#), enables sUAS owners or operators to apply for a Part 107 Airspace Authorization and/or a Part 107 Operational Waiver in order to fly outside the requirements of certain sections of the sUAS Part 107 Rule and within the National Airspace System (NAS). Federal Aviation Administration (FAA) employees and contractors use data collected from sUAS owners or operators to analyze and process applications for Operational Waivers and/or Airspace Authorizations.

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

Introduction & System Overview

Under [14 Code of Federal Regulations \(CFR.\) Part 107](#), a pilot flying under the sUAS rule must be at least 16 years old, must pass an initial aeronautical knowledge test at an FAA-approved knowledge-testing center¹, and must be vetted by the Transportation Safety Administration². Additionally, under 14 CFR Part 107, the sUAS must weigh less than 55 lbs. and must be registered with the FAA.

sUAS owners or operators who want to fly outside the requirements prescribed in Part 107, and are able to provide a sufficient description of how they can operate a sUAS safely outside of the restrictions, may submit an application for a Part 107 Certificate of Waiver and/or Airspace Authorization from the FAA, using the [FAADroneZone public portal](#). FAADroneZone is the official FAA website for managing all FAA drone services, including Operational Waiver and Airspace Authorization applications. The application form is an electronic version of [FAA Form 7711-2](#).³

Airspace Authorizations through FAADroneZone

Airspace authorization are requested through FAADroneZone when any of the following apply:

¹ A person who already holds a pilot certificate issued under 14 C.F.R. Part 61 and has successfully completed a flight review within the previous 24 months can complete a Part 107 online training course at <https://www.faasafety.gov/> to satisfy this requirement.

² For TSA vetting process, see https://www.flightsafety.com/fs_tsa_index.php.

³ OMB Control Number: 2120-0768.



1. Applicant wants to fly in areas that are in controlled airspace and are not covered by Low Altitude Authorization and Notification Capability (LAANC), the red grids depicted on the UAS Facility Maps.
2. Applicant wants to fly in a “zero” grid area above airport property.
3. Applicant has a waiver under Part 107 and wants to fly in controlled airspace using the waiver.

Applying for a sUAS Part 107 Waiver or Authorization

Once a FAADroneZone account has been created and an owner or operator logs into their account, the Privacy Act Statement is displayed and they must agree to the content in the “FAADroneZone System Use Notice” window before proceeding.

The sUAS owner or operator can then navigate to services offered to drone owners and operators by selecting “Launch Drone Owners and Pilots Dashboard,” where they can register and manage their drone inventory, apply for and manage Part 107 waivers and authorizations, and submit Part 107 accident reports.

Prior to completing any applications, the FAA encourages applicants to review some resource material and provides links to the following documents.

- [Part 107 Operational Waiver Application Instructions](#)
- [Educational webinar series about the waiver process](#)
- [Waiver Safety Explanation Guidance](#)
- [Waiver Safety Explanation Guidelines and Guiding Questions](#)
- [Part 107 Waiver Section Specific Evaluation Information](#)

The Part 107 Waiver application automatically prepopulates the following information via an electronic data exchange with the Small Unmanned Aircraft Registration System (sUASRS): owner or operator’s profile information, including the name/organizational name, e-mail address, telephone number, and mailing address. Next, the sUAS operator enters their address, which is then electronically verified by [SmartyStreet](#). If the address cannot be verified through SmartyStreet as valid, an error message is displayed and the user cannot proceed with the submission. If the address can be verified, the sUAS owner or operator is allowed to continue. For all requests (except where noted below), the sUAS operator continues to fill out the remainder of the application entering the following PII and other information:

- Remote Pilot Certificate Number (optional)
- Alternate E-mail Address (optional)
- sUASRS Registration Number (optional)
- sUAS Make and Model (optional)
- Location of Proposed Operation (free text)



- Description of Proposed Operation (free text)
- Justification that the operation is safe under the terms of the waiver (free text)

Once the sUAS operator enters the information and submits the request, a unique 13 alphanumeric reference number is generated and the request is automatically routed to the FAA Part 107 Waiver Team for processing. The reference number is used to identify the request. This reference number is available to both FAA and FAA contract analysts, and sUAS owners or operators.

Processing a sUAS Part 107 Waiver Request

The FAADroneZone system is used by FAA and FAA contract analysts to access the Part 107 Waiver or Authorization applications. Analysts must first be authorized by FAA management and are authenticated to the system using their FAA-issued Personal Identification Verification (PIV) card. Access for analysts is further controlled using third party user management software to authenticate, manage and secure users and roles, including access to the Part 107 Waiver or Authorization application based on role(s) pertaining to their job responsibilities.

Once authenticated to the FAADroneZone, the FAA and FAA contract analysts proceed to the Part 107 Waiver or Authorization application to start processing requests. An analyst can view a list of all applications awaiting to be processed and must “claim” a request to begin the analysis process. The analysis of a waiver application can result in any one of the following five outcomes: Approve with Full Grant, Approve with Partial Grant, Deny Request, Cancel Request, or Request for more Information (RFI).

The analyst starts processing the request by reviewing the sUAS owner or operator has provided information (name/organizational name, e-mail address, telephone number, and mailing address), as submitted by the sUAS operator. The PII used in a request does not itself determine if a sUAS owner or operator is approved or denied. The collected PII only identifies the person, and/or organization that is making the request and the equipment being used. Non-PII data, such as type of operation, location, and Concept of Operation (ConOps), determines approval or denial.

Approve with Full Grant

The analyst analyzes all application data, completes a checklist, generates required forms, enters a comment in FAADroneZone recommending approval, and routes the application and draft FAA Form 7711-2 to an FAA reviewer. An FAA reviewer reviews the data and checklist to confirm the analyst’s recommendation, then routes the draft FAA Form 7711-2 to an FAA Manager for signature. If the manager agrees with the full grant approval, they add their electronic signature, which approves the request. FAA and contract analysts upload signed documents into FAADroneZone and close-out the application. If the reviewer or manager do not agree with the approval recommendation because of incomplete



information, insufficient safety explanation, or other operational reasons, they can route the request back to the analyst for re-analysis and possible denial or RFI (see Deny Request and RFI process below).

Approve with Partial Grant

The Partial Grant process is used for applications requesting multiple regulations in which some waived operations are approved, and others are denied. It combines the processes described in the paragraphs above and below, by allowing the analyst to examine all application data, and recommend approval for one or more requested regulations while denying the remaining regulation(s). A checklist is completed, and draft FAA Form 7711-2 and denial letter are generated.

An FAA reviewer reviews the data and checklist to confirm the analyst's recommendation. The draft FAA Form 7711-2 is routed to an FAA Manager for signature and the denial letter is uploaded to FAADroneZone to be sent directly to the applicant once the application record is closed.

If the FAA manager agrees with the full grant approval, they add their electronic signature, which approves the request. FAA and FAA contract analysts upload the signed FAA Form 7711-2 into FAADroneZone and closeout the application. If the reviewer or FAA manager do not agree with the approval of the partial grant, they can return the application to the analyst for re-analysis.

Deny Request

The analyst evaluates all application data, completes a checklist, generates a denial letter, enters a comment in FAADroneZone recommending disapproval, and routes the application and letter to an FAA reviewer. The determination to deny a request is based on incomplete information, insufficient safety explanation, or other operational reasons. The FAA Analyst selects the reason for denial in FAADroneZone and routes the application denial letter to the FAA reviewer. The FAA reviewer reviews the data and checklist to confirm the analyst's recommendation.

If the FAA reviewer agrees with the denial, they add a comment in FAADroneZone and route the application to the FAA contract analysts for closeout of the application. If the reviewer does not agree with the denial, they can return the application to the analyst for re-analysis.

Cancel Request

Although infrequent, an FAA analyst may cancel a request based on a sUAS owner or operator initiating a cancellation request. Typically, the FAA will contact the applicant and recommend they cancel their own request.



Cancellations occur based on airspace, duplicate requests, elapsed dates, incorrect waiver or authorization type requested, waiver not required, or the request already being combined with another request. The FAA Analyst adds the reason for the request cancellation, which completes the request.

Request for Information (RFI)

The FAA or contract analyst may determine that additional information is needed to properly analyze an application. RFI are made electronically, via FAADroneZone, and sent to the sUAS owner or operator's contact information on record.

Examples of requests for additional information include picture of the proposed area, clarification on location, incomplete or insufficient response to a Waiver Safety Explanation Guideline (WSEG). The request does not include a request for any additional PII. The applicant responds to the RFI via FAADroneZone by either entering text, uploading document(s), or a combination of both. The FAADroneZone automation sends an email to the analyst when an applicant has submitted a response. Once the FAA or FAA contract analyst receives an RFI response via FAADroneZone, the request is reopened, data is reviewed, and it continues through the approval, partial approval, denial, or cancellation process.

FAADroneZone automatically sends a generic e-mail to the sUAS owner or operator for all five of the outcomes described above, instructing them to log in and view the status of their request. The sUAS owner or operator is not required to take any action at that point. However, if the sUAS owner or operator logs back into their FAADroneZone account, they can review the status of their request. Additionally, they can download the documents as a Portable Document Format for their own records.

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) v3⁴, 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 Organizations⁵.

⁴ <http://www.cio.gov/documents/FEA-Security-Privacy-Profile-v3-09-30-2010.pdf>

⁵ http://csrc.nist.gov/publications/drafts/800-53-Appendix-J/IPDraft_800-53-privacy-appendix-J.pdf



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 Part 107 Waiver and Authorization application. The application will maintain records of a sUAS owner or operator's name and other personal identifiers.

The Department of Transportation (DOT) has published the Privacy Act System of Records Notice (SORN), [DOT/FAA 854, Small Unmanned Aircraft Systems \(sUAS\) Waivers and Authorizations, 84 FR 32512, July 8, 2019](#), which provides notice to Part 107 owners or operators related to waivers and authorizations.

[The Operation and Certification of Small Unmanned Aircraft Systems Final Rule](#) (81 FR 42063, June 28, 2016) and the amendment, [Operation of Small Unmanned Aircraft Systems Over People](#) (86 FR 4314, January 15, 2021), serve as additional public notices of the FAA's information practices and the privacy impact of the program.

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 website at the point of collection. Individuals have the opportunity to read the statement and then must agree that they understand all the terms and conditions of using the application prior to proceeding with providing any information to create an account or profile.

The publication of this Privacy Impact Assessment also demonstrates transparency by the FAA.

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.



Information collected from sUAS owners or operators is provided directly by them and voluntarily provided for the purpose of processing Part 107 airspace waiver and authorization requests. The Part 107 Waiver or Authorization application automatically prepopulates the following information, via an electronic data exchange with the sUASRS application, into the online electronic FAA Form 7711-2: sUAS owner or operator's profile information including the name/organizational name, e-mail address, telephone number, and address. Next, the sUAS operator continues to fill out the remainder of the Form 7711-2 by entering on the website: the Remote Pilot Certificate Number (optional), alternate e-mail address (optional), sUASRS Registration Number (optional), sUAS make and model (optional), the location and description of proposed operation, and the details of the justification that the operation is safe under the terms of the waiver. A unique reference number is generated and is used to track the request. The sUAS owner or operator is responsible for the accuracy of the information they enter.

There is a possibility that the sUAS owner or operator may enter incorrect information or that the prepopulated information contained in the application may be different. The sUAS owner or operator can update/edit the information until the request is submitted. Once the request has been submitted, the sUAS owner or operator cannot change any information within the request. At any time up until being issued an approval (Certificate of Waiver) or denial letter, the sUAS owner or operator may cancel a request and submit a new/corrected request, via FAADroneZone. At any time, the sUAS owner or operator can update or correct any erroneous PII contained in their profile by logging into FAADroneZone and editing details in their profile.

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.

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. To that end, the FAA issued regulations, including the Operation and Certification of Small Unmanned Aircraft Systems final rule which was amended by the Operation of Small Unmanned Aircraft Systems Over People rules, establishing requirements for the safe operation of the UAS in the NAS, which are located at 14 C.F.R. Part 107.

14 C.F.R. § 107.200 establishes that the FAA Administrator may waive certain provisions in Part 107 if the proposed sUAS operation can safely be conducted under the terms of a waiver. Under 14 C.F.R. § 107.205, the FAA enumerates which regulations may be waived by the Administrator. 14 C.F.R. § 107.41 prohibits the operation of sUAS in Class B, Class C, or Class D airspace, or within the lateral boundaries of the surface area of Class E airspace designated for an airport without prior authorization from Air Traffic Control.

The purpose of an airspace authorization application is to receive, evaluate, and respond to requests for authorization to operate a sUAS, pursuant to 14 C.F.R. Part 107, in Class B, C, or D airspace or within the lateral boundaries of the surface area of Class E airspace designated for an airport. The purpose of an operational waiver application is to receive, evaluate, and respond to requests for a Certificate of Waiver to deviate safely from one or more sUAS operational requirements specified in part 107. The FAA also will use these applications to support FAA safety programs and agency management, including safety studies and assessments. The FAA may use contact information provided with requests for waiver or authorization to provide sUAS owners and operators information about potential



unsafe conditions and educate sUAS owners or operators regarding safety requirements for operation. The FAA will also use this application to maintain oversight of FAA issued waiver or authorizations, and FAA may use records from this application for enforcement purposes.

The sUAS Part 107 Waiver and/or Airspace Authorization application service collects name, email address (and alternate email address), telephone number, mailing address, remote pilot certificate number (optional) and sUASRS registration number (optional).

Internally, the sUAS Part 107 Waiver and/or Airspace Authorization application service provides access to PII with these two FAA IT systems:

- For the purposes of creating analytical and statistical reports, Tableau/Denodo toolset has access to sUAS Part 107 Waiver and/or Airspace Authorization application service PII mentioned in the System Overview section.
- For the purpose of allowing air traffic controllers to have a complete picture of all the waivers and authorizations in their area, the LAANC system has read-only access to Part 107 Operational Waiver/Authorization PII data listed in the System Overview section.

Externally, the sUAS Part 107 Waiver and/or Airspace Authorization application service exchanges full application street addresses with external system SmartyStreets for the purpose of verifying addresses.

Currently, The FAA makes valid Certificates of Waiver or Authorization (Form 7711-2) available to the public at https://www.faa.gov/uas/commercial_operators/part_107_waivers/waivers_issued/. The PII contained in the waiver that is available to the public is limited to the organizational name, responsible person name, and address of waiver applicant. Certain authorizations, such as Operations in Certain Airspace authorizations will not be disclosed to the public on the website.

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 sUAS Part 107 Waiver and/or Airspace Authorization application service collects and retains the minimum amount of PII necessary for its specified purposes of 1) receiving, evaluating, and responding to requests for authorization to operate a sUAS, pursuant to 14 C.F.R. Part 107, in Class B, C, or D airspace or within the lateral boundaries of the surface area of Class E airspace designated for an airport and for 2) receiving, evaluating, and



responding to requests for a Certificate of Waiver to deviate safely from one or more sUAS operational requirements specified in part 107.

The sUAS) Part 107 Waiver and/or Airspace Authorization application service manages their records in accordance with pending National Archives and Records Administration (NARA) Records Disposition Authority DAA-0237-2023-0007. Under the proposed retention, records will be destroyed three years after the airspace authorization is revoked or cancelled. Until the disposition authority has been approved, these records will be maintained as permanent records.

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.

DOT discloses sUAS Part 107 Waiver and Airspace Authorization Application information outside DOT in accordance with [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 Small Unmanned Aircraft System (sUAS) Part 107 Waiver and Airspace Authorization Application may be disclosed outside DOT as a routine use pursuant to 5 U.S.C. § 552a(b)(3) 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. Airspace authorizations the FAA issues also 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.
- Law enforcement, when necessary and relevant to a FAA enforcement activity.
- Disclose information to the National Transportation Safety Board (NTSB) in connection with its investigation responsibilities.

The Department has also published general routine uses applicable to all DOT Privacy Act systems of records, including this system. 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” (available at <http://www.transportation.gov/privacy/privacyactnotices>).

The FAA will make valid Certificates of Waiver or Authorization (Form 7711-2) available to the public at https://www.faa.gov/uas/commercial_operators/part_107_waivers/waivers_issued/. The PII contained in the waiver that is available to the public is limited to the organizational name, responsible person name, and address of waiver applicant. Certain authorizations, such as Operations in Certain Airspace authorizations will not be disclosed to the public on the website.

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).

The sUAS owner or operator is responsible for the accuracy of the information they directly enter. There is a possibility that the sUAS owner or operator may enter incorrect information. The sUAS owner or operator cannot change the request once it has been submitted. However, at any time the sUAS owner or operator can cancel their request or update information in their FAADroneZone profile by logging into FAADroneZone and editing data in their profile. Once the FAA approves a Part 107 airspace waiver or authorization, the sUAS owner or operator cannot update or correct any erroneous PII on the actual Certificate of Waiver or Authorization. If the request is not approved, the sUAS operator can update/correct and PII in their FAADroneZone profile and resubmit the request.

The FAA uses SmartyStreet to verify addresses and the Part 107 Waiver application automatically prepopulates the following information from the sUASRS owner or operator’s profile information, including the name/organizational name, e-mail address, telephone number, and mailing address. Both features decrease the chance of error and increase data quality and integrity.

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 re-authorized to operate on May 16, 2022. The small Unmanned Aircraft System (sUAS) Part 107 Waiver and/or Airspace Authorization application service was re-authorized to operate on April 4, 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 PIIs. 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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Office of the Chief Information Officer

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