



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

**Aviation Safety Knowledge Management Environment
(ASKME) Airworthiness Certification (AWC)**

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Executive Summary

The Federal Aviation Administration (FAA) Aviation Safety Knowledge Management Environment Airworthiness Certification (ASKME AWC) operates under authority [14 CFR Part 21](#) and [49 U.S.C. § 44103](#). ASKME AWC is a web-based application that is used by an aircraft owner or someone operating on their behalf to submit an FAA Form 8130-6, *Application for a U.S. Airworthiness Certificate*, to obtain an airworthiness certificate or to amend a current certificate. In addition, Aviation Safety Inspectors (ASIs), Designees,¹ and Organization Designation Authorizations (ODAs)² use ASKME AWC to review and approve the FAA Form 8130-6, *Application for a U.S. Airworthiness Certificate*.

The FAA is publishing this Privacy Impact Assessment (PIA) for the ASKME AWC in accordance with Section 208 of the [E-Government Act of 2002](#) because the system collects Personally Identifiable Information (PII) from aircraft owners or someone operating on their behalf when submitting an application(s) for airworthiness certificate. Additionally, PII is collected from designees and ODAs that review and approve the airworthiness certificate application.

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.³

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

¹ Designees are members of the public that are certified and approved by FAA administrators to assist the FAA in matters of issuing airworthiness certificates.

² ODAs are organizations or companies, such as Boeing or Delta, enlisted to approve design changes or authorized repairs to their products by the FAA.

³Office 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).



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.

Introduction & System Overview

ASKME AWC is a web-based application used by airworthiness certificate applicants and individuals such as ASIs, Designees, and ODAs to evaluate and review an application for an airworthiness certificate. As mandated in [FAA Order 8130.2, Airworthiness Certification of Aircraft](#), the ASKME AWC application is used to capture aircraft safety data and to increase organizational effectiveness in support of the FAA's Aircraft Certification Service (AIR).

System Access

FAA employees and contractors' access ASKME AWC at <https://askme.faa.gov/AWC> using their Personal Identity Verification (PIV) card. Request for system access must be submitted to the ASKME AWC system Account Manager who is authorized to approve accounts and access authorization. The FAA employees and contractors need to send requests via email and must include the following information: Date of request, Access required, Full name, Email and Phone number, Job Title, Organization, and Justification for the level of access requested. The Account Manager replies to the user specifying whether the request has been approved or denied.

Upon the Account Manager's approval, a new user account profile creation request needs to be submitted to the AIR-952 program management group email to create the new user profile in Aviation Safety Knowledge Management Environment – Enterprise Services (ASKME ES) for the ASKME AWS system. The ASKME AWC Business Support Team Lead forwards the ASKME ES account creation request to the 9-AVS-AIR-ASKME-Program-Management mailbox including the following information: Full Name, FAA



Username, Email, Phone, Office, AWC Role, AWC Office, AWC Division, AWC Roles, Role Name, and Role Description. The AIR-952 ASKME Support Team processes the request and completes the account creation process.

Airworthiness certificate applicants access ASKME AWC at:

<https://awc.faa.gov/AWCExternalApplicant/Splash/Index> and sign in with their username and password using MyAccess. New users must register for MyAccess accounts using the Multi Factor Authentication (MFA) process. To register for a user account, an applicant needs to provide their name and email address on the MyAccess External User Registration page and complete the MyAccess account activation process, create a password, and select the MFA option. See the MyAccess Privacy Impact Assessment located at <https://www.transportation.gov/individuals/privacy/privacy-impact-assessments> for a detailed discussion.

Upon account creation, applicants receive an email notification from ASKME AWC about their authorization to access ASKME AWC, which includes their username and role.

Applicants can complete and submit the FAA Form 8130-6, *Application for a U.S. Airworthiness Certificate* electronically or via a paper application.

Electronic Application

To complete the electronic application, the applicant logs into ASKME AWC via MyAccess by entering their username and password. Applicants manually enter the aircraft registration number and ASKME AWC pulls in corresponding aircraft information, such as owner's name and aircraft make and model, from a real-time data exchange with the Civil Aviation Registry (AVS Registry).⁴

Additionally, as the applicant selects the appropriate boxes to complete the FAA Form 8130-6, *Application for a U.S. Airworthiness Certificate*, ASKME AWC is populated with information received from services and components of the ASKME ES via Transport Layer Security (TLS) protocol. A full discussion of the PII received from the ASKME ES services and components is documented in the Purpose Specification section of this PIA. Lastly, applicants upload the following documents needed to process the Form 8130-6 application:

- Drawing and photographs of aircraft or aircraft equipment
- Current weight and balance information of aircraft

⁴ Privacy Impact Assessment for this system is available at <https://www.transportation.gov/individuals/privacy/privacy-impact-assessment-faa-office-aviation-safety-aircraft-registration>.



- FAA [Form 337](#) - collects the aircraft's nationality and registration mark, serial number, make, model, series; owner's name, address, city, state, zip code, country; and agency's name, address, city, state, zip code, country.
- FAA [Form 8130-9, Statement of Conformity](#) - collects aircraft's make, model, serial number, registration number; and signature of certifier, title, organization and date.
- FAA Form 8130-15, Light-Sport Aircraft Kit Statement of Compliance - collects name, title, and signature.
- Foreign airworthiness certificate issues

All documents must be uploaded and if not, ASKME AWC halts the application process if required documentation is not uploaded. The applicant will receive an email informing them that their application has been halted and that additional information is required.

Paper Application

For FAA Form 8130-6 applications submitted by paper, applicants manually enter the same information collected on the electronic application and then mail the application to their local Flight Standards District Office (FSDOs), based on the respective applicant's zip code. Once received, the local FSDO office assigns an ASI to the application. The ASI scans and uploads the application into ASKME AWC and manually inputs information from the paper forms into ASKME AWC. All paper FAA Form 8130-6 must be signed by the applicant and include all required documents listed above for the electronic application. If not, the application process is halted, and the FAA Form 8130-6 is returned to the applicant for the needed signature or documents.

Paper applications are stored at the local FSDO in a locked cabinet until the certification process is completed. Upon completion of the certification process, paper applications, the FAA Form 8130-6, are sent to the Aviation Registration Branch (AFB-710), FAA Aircraft Registry, where they are scanned, transmitted with encryption, and electronically stored in the AVS Registry database. All paper forms are stored and locked in file cabinets within AFB-710 until the prescribed record retention requirements are met.

Processing Applications

The applicant can select a designee that they would like to review the application, or an application is assigned to a designee by an ASI. ODAs can assign cases to themselves with FAA oversight. ASKME AWC generates and send the designee or ODA an email that includes the designee's or ODA's full name, email address, application name and number. Designees and ODAs have access to only those cases assigned to them in ASKME AWC.



Designees and ODAs perform the tasks necessary for the issuance of an airworthiness certificate, such as inspecting aircraft components, reviewing all design and production paperwork (such as flight manuals), examining flight reports from test pilots, and completing a thorough ground inspection of the aircraft. If the inspection and review of design and production paperwork of the aircraft comply with FAA regulations and the aircraft is deemed suitable for safe flight, designees and ODAs can issue an approval letter, as well as a FAA [Form 8100-2](#), Standard Airworthiness Certificate or a special certificate Form 8130-7⁵, Special Airworthiness Certificate.

For approvals, designees and ODAs enter comments into a free-form text field, explaining the rationale for the approval that includes the appropriate 14 CFR and days in effect pertaining to the approval. The designee and ODA electronically sign each approval letter and the [Form 8130-6](#), and then sends it to an ASI for their final review and processing of applications.

An application is denied if the designee or ODA determines the aircraft does not meet the requirements for the certificate requested. In most cases, once the reason(s) is mitigated, the applicant may reapply for the certificate(s). For denial, the process would be the same as the above paragraph.

ASIs must sign all approval or denial letters, Form 8100-2, Standard Airworthiness Certificate or Form 8130-7, Special Airworthiness Certificate generated by Designees/ODAs, for them to go into effect.

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) v3⁶, 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 Organizations⁷.

⁵ This form is restricted to internal-use only by FAA employees and is not accessible to the public.

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

⁷ 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.

For the paper application ASKME AWC collects the information from the applicant. For the electronic application, ASKME AWC does not collect information directly from an individual but receives aircraft make, model, and description, aircraft owner's full name, business address, email address, telephone number, job title, certified mechanic identification number, office identifier and office location. information from AVS Registry. Primary records may be retrieved by an identifier such as name, but the record is not about an individual but about the aircraft. Therefore, these records are not subject to the Privacy Act. Notice of FAA use of the information is provided at the initial point of collection.

The publication of this PIA demonstrates DOT's commitment to providing appropriate transparency into the ASKME AWC system.

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.

ASKME AWC does not retrieve records by an identifier and is therefore not a Privacy Act System of Record. For electronic applications, ASKME AWC does not collect information directly from an individual but receives aircraft make, model, and description, aircraft owner's full name, business address, email address, telephone number, job title, signature, certified mechanic ID number, office identifier and office location information from AVS Registry. Individuals would have to go to the point of initial collection to access, amend, or delete their records.



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 FAA collects PII for the ASKME AWC under authority 14 CFR Part 21 and 49 U.S.C. § 44103. The FAA will use the information to review and approve the FAA Form 8130-6, Application for a U.S. Airworthiness Certificate that is submitted by aircraft operators or someone operating on their behalf.

ASKME AWC sends and receives data from ASKME ES via Transport Layer Security (TLS) protocol. ASKME AWC uses the following ASKME ES services and common components:

- ASKME ES *User Profile Service* sends and receive names, job title, business address, business telephone number, office identification, and FAA email address to create user profiles.
- ASKME ES *Address Validation Service* receives the business addresses with zip codes from ASKME AWC. The purpose of this data exchange is to validate addresses with the United States Postal Service (USPS). ASKME ES sends the corrected or validated addresses back to ASKME AWC.
- ASKME ES *External Authentication Logging Service (EAL Service)* receives full name of applicants, designees, or ODAs authorized representative, company name (if applicable), business telephone number, business email address, fax number (optional), and mailing address.
- ASKME ES *EAL Service* sends usernames to identify and authenticate external users.
- ASKME ES *Designee Service* sends the designee's full name, designee identification, designation type and status, business email address, and business telephone number from the Designee Management System (DMS) to ASKME AWC. The purpose of this data exchange is to populate the list of active designees and designation within ASKME AWC.
- ASKME ES *Organization Delegation Authority (ODA) Service* sends the ODA's full name, authorization number, and ODA type. The purpose of this data exchange is to populate the list of active ODAs and their type within ASKME AWC.



ASKME AWC receives data from the AVS Registry that includes aircraft make, model, and description, full name, business address, email address, telephone number, job title, signature, certified mechanic identification number, office identifier and office location. The purpose of the data exchange is to assist in the maintenance of U.S. civil aircraft registration and airworthiness certification records. ASKME AWC send the paper applications of the FAA Form 8130-6 to the Aviation Registration Branch (AFB-710), FAA Aircraft Registry, where they are scanned and electronically stored transmitted with encryption to the AVS Registry.

ASKME AWC receives data from Federal Aviation Administration Directory Services that includes employees and contractor email address. The purpose of this data exchange is to authenticate all FAA users into the AWC 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.

FAA personnel collect the minimum amount of information from individuals to review and approve an airworthiness certificate application. Records for the primary purpose of the system are maintained in accordance with National Archives and Record Administration (NARA) approved schedule [N1-237-77-3, Item 26](#), Civil Airworthiness files and destroyed two years after the certificate is issued. System Access Records are maintained in accordance with [GRS 3.2, Approved January 2023, Information Systems Security Records](#) and are destroyed when business use ceases.

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.

ASKME AWC does not share information externally unless disclosure is required by law and does not use PII in any matter that is incompatible with the reason for which it was collected.



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).

For electronic applications, the information is received from the AVS Registry and other systems discussed in the Purpose Specification section of the PIA. ASKME AWC receives daily updates to ensure the accuracy of the information. For paper applications, the ASI manually inputs information from the paper FAA Form 8130-6. In doing so they verify the accuracy of the information as it is entered. Applicants can amend their electronic and paper if needed. If an applicant needs to edit their application, the ASI can electronically send or mail the Form 8130-6 back to the applicant for the needed updates, and then the applicant sends the revised application back to the ASI.

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.

ASKME AWC assessment is part of the Aviation Safety Knowledge Management Environment 2 (ASKME 2) security boundary. 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 the National Institute of Standards and Technology Special Publication (NIST) 800-53, Revision 5, *Security and Privacy Controls for Federal Information Systems and Organizations*, dated September 2020 (includes updates as of Dec. 10, 2020).

These safeguards include an annual independent risk assessment of the ASKME 2 system to test security processes, procedures, and practices. The system operates on security guidelines and standards established by NIST. Only FAA personnel with a need to know are authorized to access the records in ASKME AWC. All data in-transit is encrypted and access to electronic records is controlled by PIV and Personal Identification Number (PIN) and limited according to job function. Additionally, FAA conducts annual cybersecurity assessment to test and validate security process, procedures, and posture of the system. Based on the security testing and evaluation in



accordance with the FISMA, the FAA issued ASKME 2 an authorization to operate on July 10, 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.

The DOT/FAA implements 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, *FAA Information Security and Privacy Program & Policy*, implements the various privacy requirements of the Privacy Act of 1974 (the Privacy Act), the E-Government Act of 2002 (Public Law 107-347), DOT privacy regulations, 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, the FAA will implement additional policies and procedures as needed as they relate to the access, protection, retention, and destruction of PII. Federal employees and contractors who work with ASKME AWC are given clear guidance about their duties as related to collecting, using, and processing privacy data. Guidance is provided in mandatory annual security and privacy awareness training, as well as FAA Order 1370.121B. The FAA conducts periodic privacy compliance reviews of ASKME AWC as related to the requirements of OMB Circular A-130, *Managing Information as a Strategic Resource*.

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