



U.S. Department of Transportation
Privacy Impact Assessment
Federal Aviation Administration (FAA)
Aircraft Registration System
AVS Registry

Responsible Official

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Executive Summary

The Aircraft Registration System, also known as the Aircraft Registry or AVS Registry, was developed to help the Federal Aviation Administration (FAA) Office of Aviation Safety (AVS) meet its responsibilities for the certification and registration of aircraft under 49 United States Code (U.S.C.) § 44103. The Aircraft Registry serves as the national repository for aircraft registration records and provides the central services necessary for control of these records, which are used by FAA to analyze safety data and manage time-intensive processes such as examination activities.

The FAA previously published a Privacy Impact Assessment (PIA) in accordance with the [E-Government Act of 2002](#), because the Aircraft Registry records contain Personally Identifiable Information (PII) on individuals registering aircraft - see [Airmen/ Aircraft Registry Modernization System](#) and [Aircraft Registration](#) PIAs. The FAA is updating the PIA to reflect changes to the system that include an update to the governing System of Records Notice (SORN) [DOT/FAA 801 “Aviation Registration Records”, August 9, 2023, 88 FR 53951](#) and to note Aircraft Registry is exchanging data with the United States Agent Service (USAS) Portal. The airman certification portion of the Aircraft Registry is addressed in a separate PIA named [Airman Certification System](#).

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.¹

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

¹Office 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).



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

The primary mission of the FAA is to provide the safest, most efficient aerospace system in the world. One of the ways the FAA supports this mission is through the registration of aircraft, as required under Title 49 of the United States Code. The FAA's rules governing all aviation activities in the United States can be found in Title 14 of the Code of Federal Regulations (CFR). A wide variety of aviation-related activities are regulated, such as airplane design, typical airline flights, pilot training activities, hot-air ballooning, and even model rocket launches. The rules are designed to promote safe aviation while protecting pilots, passengers, and the public from unnecessary risk. Aircraft owners are responsible for compliance and familiarity with the applicable 14 CFR part(s) concerning the operation and maintenance of their aircraft. Aircraft owners must register aircraft they purchase and intend to operate in the National Air Space (NAS) with the Aircraft Registration Branch (AFB-710).

The Aircraft Registration Branch is responsible for the national programs of aircraft registration. In addition, the Aircraft Registration Branch is responsible for the recording of documents that create or affect a security interest in U.S. civil aircraft, identification of registered aircraft, and law enforcement assistance as it involves the aircraft registration program. The Aircraft Registration Branch is tasked to register aircraft in accordance with 49 U.S.C. §§ 44102 through 44103, and to provide a system for recording documents that affect an interest in civil aircraft of the United States under 49 U.S.C. §§ 44107 and 44108. The FAA also must ensure that registration and document recording systems effectively serve the needs of buyers and sellers of aircraft, officials responsible for enforcing laws related to the regulation of controlled substances under 21 U.S.C. § 802, and other users of the Aircraft Registry under U.S.C. § 44111. Information submitted by aircraft owners under the paper-based system is used by the FAA to help link the aircraft with its owner, educate owners, and when necessary, aid in pursuing enforcement action.



The Aircraft Registry is a central repository of all registered aircraft. The Aircraft Registry satisfies treaty obligations under the Convention on International Civil Aviation (ICAO), Annex 7, and is also used to determine that aircraft are registered. The central repository provides summary descriptive statistics for the development of analytical studies in support of FAA safety programs and agency management and provides aircraft owners and operators information about potential mechanical defects or unsafe conditions of their aircraft in the form of airworthiness directives.

Aircraft owners are required to register aircraft by completing the Aeronautical Center ([AC Form 8050-1, Aircraft Registration Application](#)). Individuals must obtain an original [Aircraft Registration Application Form, AC Form 8050-1](#), from the Aircraft Registration Branch AFB-710 website. The aircraft owner must provide their:

- Full name
- Address
- Phone number
- Email address
- Citizenship (Applicants must certify that they are a US citizen or a lawfully admitted resident alien)
- Aircraft Registration Number (N-number)
- Aircraft information (manufacturer, model, and serial number; and
- Legal Documents/Records to support registration (e.g., evidence of ownership (such as bill of sale), divorce decree, court order).

The [AC Form 8050-1](#) and evidence of ownership (such as a bill of sale), and payment for the \$5 registration fee are mailed to the FAA. Upon receipt of these documents by the Aircraft Registration Branch, they are time-stamped to establish order of receipt. Any fees received are posted on the corresponding documents. The documents are identified by type (envelope, application, evidence of ownership, correspondence, security/lease agreement, etc.), placed in order of receipt for review, and scanned to create a work packet containing complete images, front and back, of all items received. This work packet is then sent to be reviewed by the aircraft registration examination staff. Imported and new aircraft are prioritized because they are unable to be operated until they are assigned a registration number and registered. An undue financial burden could be suffered by their owners if they had to wait several days to be registered. Upon review of the items provided in the work packet, the examiner determines if all requirements have been met to assign a U.S. Registration Number, register the aircraft, and record the security documents. If the items do not meet the requirements for registration or recordation, a letter is sent that explains what must be done, supplied, or corrected to enable registration or recordation. Unless returned for correction, the original paper documents and images are retained until a reply is



received. When the registration examiner determines that all requirements are met, the images are annotated with a dated registration or recordation notation, to indicate the FAA has officially filed a document, and transferred permanently into the aircraft's record file. At this point, if the aircraft is registered, or the registration is updated or renewed a certificate of aircraft registration is mailed to the owner, and if requested a registration letter is sent by facsimile to support operation of the aircraft within the NAS until the formal certificate is delivered. The registration number is assigned to the aircraft.

Aircraft owners must renew their registration every seven years. To facilitate that process, the FAA sends each aircraft owner a "Notice: Expiration of Aircraft Registration" letter six months before the registration expires. Upon receiving the letter, aircraft owners can submit their renewals by mailing in the paper Aircraft Registration Renewal Application or via the Aircraft Registration Renewal website. To use the website, the aircraft owner enters their aircraft's N-number and the random, unique security code sent to them in the expiration notice letter. Once logged in, the website displays their aircraft owner's registration information. If no changes are necessary, the aircraft owner affirms that the information is accurate. If changes are necessary, the individual must complete the paper renewal application and mail it to the Aircraft Registration Branch for processing. The \$5 registration renewal fee is processed by the FAA cashier and accounting offices or, if paid by credit card, pay.gov². Aircraft Registry does not contain any payment information. A transaction identification number is assigned upon confirmation of payment.

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) v3³, 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 Organizations⁴.

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

² The Pay.gov PIA is available at <https://www.fiscal.treasury.gov/files/pia/paygov-pcia.pdf>.

³ <http://www.cio.gov/documents/FEA-Security-Privacy-Profile-v3-09-30-2010.pdf>

⁴ http://csrc.nist.gov/publications/drafts/800-53-Appendix-J/IPDraft_800-53-privacy-appendix-J.pdf



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 Department of Transportation (DOT) deploys multiple techniques to ensure that individuals are informed of the need to register their aircraft and the purposes for which the Department collects and maintains PII in support of aircraft registration and certification activities.

The FAA retrieves records in the Aircraft Registry by an individual's name and other personal identifiers and protects Privacy Act records in accordance with the Department's published SORN entitled [DOT/FAA 801 Aviation Registration Records](#). As required, a Privacy Act statement discussing the Department's privacy practices regarding the collection, use, sharing, safeguarding, maintenance, and disposal of PII is included on all applicable forms used to register aircraft with the FAA.

The publication of this PIA demonstrates DOT's commitment to provide appropriate transparency into the Aircraft Registry.

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.

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 Ave. SW
Washington, DC 20591

Included in the request must be the following:

- Name
- Mailing address
- Phone number and/or email 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 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

All aircraft must register with the FAA to operate in the NAS. For aircraft registered under 14 CFR part 47, information in the Aircraft Registry is collected directly from the aircraft owner using paper-based forms and other hard copy supplemental documentation submitted by the aircraft owner. Once received by the FAA, these documents are converted into electronic documents and maintained in the Aircraft Registration System. Individuals may verify that the FAA has received and uploaded their forms and documentation in the Aircraft Registry by conducting a search for their records in the Aircraft Registry using the [FAA's Aircraft Inquiry tool](#).

Aircraft owners may update their information during the registration renewal process or at any other time the aircraft owner chooses.

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.

Under 49 U.S.C. §§ 44102 and 44103, the FAA is required to register aircraft and maintain an aircraft registry. The Aircraft Registry is used to:

- Provide a register of United States civil aircraft to aid in the national defense and to support a safe and economically strong civil aviation system, and to meet treaty requirements under the Convention on International Civil Aviation, Annex 7;
- Determines that aircraft are registered in accordance with the provisions of 49 U.S.C. 44103;
- Supports FAA safety programs and agency management;
- Aids law enforcement and aircraft accident investigations;
- Serves as a repository of legal documents to determine legal ownership of aircraft;



- Provide aircraft owners information about potential mechanical defects or unsafe conditions of their aircraft in the form of airworthiness directives;
- Educate owners on safe operating requirements; and
- Receive and record payment of aircraft registration and recording fees.

FAA collects the name of the aircraft owner and address, so that aircraft can be associated with an owner. This assists the FAA in its compliance efforts, by allowing the FAA to identify the owner when there is an incident, and educate them on safe operating requirements and, when appropriate, take enforcement action against individuals who violate the rules or operate unsafely. Under the paper-based system in 14 CFR part 47, the FAA collects legal documents establishing ownership and lienholders for registered aircraft.

AVS Registry provided the [USAS Portal](#) a one-time data exchange of aircraft records. The information shared includes the name, email address, N-number and serial number and the information was used to prepopulate the USAS Portal.

AVS eForms send through a file transfer protocol server the completed [FAA Form 337 Major Repair and Alteration \(Airframe, Powerplant, Propeller, or Appliance\)](#)⁵ data that includes the aircraft's nationality and registration mark, serial number, make, model, and series; and the owner's name, and address (as shown on registration certificate). The information transmitted becomes part of the Aircraft record.

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.

Under the paper-based system in 14 CFR part 47 the FAA collects the minimum amount of information necessary to establish and maintain the record for all United States civil aircraft. The digital images of aircraft registration are the official legal record. For the part 47 process, the paper forms are maintained until it has been confirmed that the digital image meets quality standards and in accordance with retention policies are destroyed upon completion of quality review.

The National Archives and Records Administration (NARA) working in partnership with the FAA has designated the Civil Aviation Registry, to include Aviation Registry aircraft registration records and image file indexes, as the Permanent Record for United States civil aircraft registration information. These records are therefore kept as permanent records in accordance with the NARA approved records disposition schedule [N1-237-04-03](#). The

⁵ OMB Ctrl No. 2120-0020, Expires 07/31/2026.



permanent retention of the records allows for research and a complete history of specific aircraft and documents the development and progression of registration of the American Aircraft Registration System.

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 [DOT/FAA 801 Aviation Registration Records](#) SORN includes the following system specific routine use permitting the sharing of Privacy Act records:

- To the public (including government entities, title companies, financial institutions, international organizations, FAA designee airworthiness inspectors, and others), when permitted, information, including aircraft owner's name, address, United States Registration Number, aircraft type, legal documents related to ownership or financing of an aircraft and ADB-S summary reports, to facilitate aviation safety, security, and commerce.
- To law enforcement when necessary and relevant to a FAA enforcement activity.
- To government agencies, whether Federal, State, Tribal, local or foreign, information necessary or relevant to an investigation of a violation or potential violation of law, whether civil, criminal, or regulatory, that the agency is charged with investigating or enforcing; as well as, to government agencies, whether Federal, State, or local responsible for threat detection in connection with critical infrastructure protection.

The Department has also published 15 additional routines used applicable to all DOT Privacy Act system of records, including this system. These routine uses are published in the Federal Register at [75 FR 82132, December 29, 2010](#), [77 FR 42796, Jul 20, 2012](#), and [84 FR 55222, October 15, 2019](#), under "Prefatory Statement of General Routine Uses" available at <https://www.transportation.gov/individuals/privacy/privacy-act-system-records-notices>.

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).

FAA collects, uses, and retains data that is relevant and necessary for the purpose for which it was collected. The Aircraft Registry performs extensive edit checks on all data that is entered into the system. It maintains images of the documents it receives on aircraft owners



as the legal record; database entries are checked against these images and the images can be referred to at any time as an authoritative source. The aircraft information is inspected by Quality Control and Quality Assurance processes to ensure accuracy.

Aircraft owners must renew their aircraft registration every seven years for aircraft registered under part 47; at that time, they must certify that the information associated with their registration is still accurate. If it is not accurate, they are required to make the appropriate updates. For registrations under the paper-based system in 14 CFR part 47, registered owners are required to notify the FAA in writing of any change of address within 30 days after any change in owner's mailing address.

Under the paper-based system, in compliance with statutory requirements, documents are processed in date received order. Applicants may check to see if their documents have been received by using the FAA website "Aircraft Registration" link and selecting the "Download the Aircraft Registration Database" link to search the document index. The FAA updates the "Aircraft Registration Inquiry" site at midnight on each federal workday. Applicants can find new information immediately following this update.

Occasionally, items of sensitive PII (SPII) not necessary to accomplish aircraft registration are submitted for inclusion in the aircraft record. Like any information submitted as part of the aviation registration activity, SPII is considered to have been knowingly submitted to a public record. Such submission to a known public record is considered equivalent to permission to release the data. Any individual whose SPII appears in the aircraft record may request the redaction of that information. The FAA will take immediate action to redact SPII from publicly accessible records that is not necessary to maintain the integrity of the aircraft record.

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.

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 5, Security and Privacy Controls for Federal Information Systems and Organizations, dated September 2020.



The AVS Registry was issued an authority to operate (ATO) on April 20, 2022. Access to the system is limited to those with appropriate security credentials, an authorized purpose, and need-to-know. The FAA deploys role-based access controls in addition to other protection measures reviewed and certified by the FAA's cybersecurity professionals to maintain the confidentiality, integrity, and availability requirements of the system.

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's Office of the Chief Information Officer, Office of information Systems Security, Privacy Division is responsible for governance and administration of FAA Order 1280.1B, Protecting PII. FAA Order 1280.1 implements the various privacy laws based on the Privacy Act of 1974 (the Privacy Act), the E-Government Act of 2002 (Public Law 107-347) the FISMA, 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, additional policies and procedures will be consistently applied, especially as they relate to the access, protection, retention, and destruction of personally identifiable information. Federal and contract employees are given clear guidance in their duties as they relate to collecting, using, processing, and security privacy data. Guidance was to be provided in the form of mandatory annual security and privacy awareness training, as well as FAA Privacy Rules of Behavior. The DOT and FAA Privacy Offices will conduct periodic privacy compliance reviews of Aircraft Registry with the requirements of OMB Circular A-130.

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