



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

Executive Summary

The Certificate of Waiver or 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, which directs the FAA to safely integrate unmanned aircraft systems (UAS) into the National Airspace System (NAS). Since the initial CADZ release on September 29, 2023, the System of Records Notice (SORN) [DOT/FAA 854 *Small Unmanned Aircraft Systems \(sUAS\) Waivers and Authorizations*](#) (88 FR 59566 – August 29, 2023) was updated and republished. Additionally, a new SORN titled [DOT/FAA 857 *Accidents, Incidents and Investigations*](#) (88 FR 73070, October 24, 2023) was included in the PIA to address individuals who may report accidents or incidents under Part 91. The PIA also addresses the monthly accident/incident reporting required.

In addition, records schedule [DAA-0237-2023-0004](#), approved by NARA on August 1, 2023, added to cover CADZ records. The CADZ release made no changes to the collection of personally identifiable information (PII) since the previously published Privacy Impact Assessment (PIA).

CADZ is part of the FAADroneZone services. This is an Appendix to the overarching PIA for [FAADroneZone](#).

Introduction & System Overview

A COA is an authorization issued by the ATO to a civil¹ or public operator² 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

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

² 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).



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 approval of a COA application from its initial draft stage to its final stage. The workflow model provides detailed 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 tracks 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 allows 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

The applicant accesses FAADroneZone and navigates to CADZ to complete the *Application for Certificate of Waiver or Authorization*³. The application collects the applicant's designated representative's name, company address, company mail address, and company phone number. It also collects information about the applicant's name, address, email address, and phone number to complete the COA application in CADZ. CADZ generates a unique numerical draft number that tracks the application prior to its submission. Once the applicant enters their contact information, the Contacts and Declarations page opens, and the applicant must enter their contact information and 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)⁴ to CADZ that does not contain any additional PII that was not previously captured during the application phase. CADZ does 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, visual surveillance methods, flight operation details, flight crew qualifications, and any special circumstance the applicant would like the

³ In rare instances, an applicant submits a paper application 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.

⁴ The public declaration letter affirms that they are qualified to operate as a public aircraft operator, 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.



FAA to consider when evaluating the COA application. 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 night and light out operations, and an executive and operational summary of planned UAS activities.
- **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 number⁵ 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 included⁶. 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 or to the next reviewer

⁵ The COA numbers are comprised of the application year, 3-letter Service Area code, sequential number, and type of COA (e.g., 2021-ESA-12334-COA).

⁶ 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.



(Air Traffic Control Specialists or Aviation Safety Inspector). This review process repeats itself until all necessary parties approve the application or determine that it cannot be approved. 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. In support of this requirement, intake and storing of reporting data was developed and implemented in CADZ.

The reporting requirements are:

- (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 the COA Application in FAADroneZone (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. On the COA Reports page, the applicant clicks on the Submit Monthly Report button to begin reporting. As part of the COA report, an applicant provides the applicant's name and contact information. The 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 requests lost communication events, equipment malfunctions, lost link events, deviations, takeoff/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 provide trend analysis and a review of approved COAs based on various parameters collected in the application, including the type of operations, aircraft type, etc. These reports do not determine decisions about individuals or specific applications. The approval or denial of a COA application relies exclusively on the merits of the application, and the CADZ reporting application does not generate any new data.

A future enhancement for CADZ will enable UAS operators to submit a monthly report regarding accidents and incidents that occur under a COA. UAS operators or their representatives must provide detailed information about accidents and incidents that take place within the reporting period.



When submitting accident or incident reports, operators are required to include the COA reference number along with the name, business email address, and business phone number of the designated representative. Alternatively, the operator can provide their name, email address, phone number, and physical address.

Applicants need to specify which UAS was involved in the accident or incident, the number of flights conducted, operational hours, the location of the accident or incident, including latitude and longitude, the landing location, speed, and type of flight. Additionally, they should include a written description of the accident or incident in a text box and upload relevant photos as evidence. This reporting process does not collect any additional PII; all collected data pertains solely to the accident or incident.

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.

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 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 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 to provide information on authorizations, waivers, and relevant processes. Along with public outreach, the FAA's UAS website (www.faa.gov/uas/faqs) is the central point for UAS stakeholders to obtain UAS information, including frequently asked questions about UAS requirements, policies, and regulations. The FAA adheres to FAA Order 7200.23D, Processing of Unmanned Aircraft Systems Requests, and FAA Order 7210.3EE, Facility Operation and



Administration, which provide policy and guidelines for the approval or denial of COA. These orders are publicly available on the [FAA's website](#).

CADZ retrieves records by an individual's name and other personal identifiers, such as the COA reference number. Therefore, COAs submitted by individuals under Part 91 (as opposed to entities, or individuals on behalf of entities) fall 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 System \(sUAS\) Waivers and Authorizations](#), 88 FR 59566 (August 29, 2023). SORN DOT/FAA 854 currently provides notice to the public of the FAA's privacy practices regarding collecting, using, sharing, safeguarding, maintaining, and disposal of information related to waivers and authorizations. The FAA processes Privacy Act records in accordance with [DOT/FAA 857 Accidents, Incidents, and Investigations](#) (October 24, 2023), which provides notice for accident and incident reporting of UAS operations conducted under the COA. CADZ is intended solely for reporting accidents and incidents; however, this information is accessible to investigators.

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.

CADZ collects information directly from the individual to process COA applications and to report monthly on UAS operations or any accidents or incidents conducted under the COA. Applicants can edit this information while still in draft within the user dashboard. However, once a report is submitted, it cannot be modified by either the user who submitted it or the FAA.

Under the provisions of the Privacy Act, individuals have the right to request searches to determine if any records 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.

CADZ collects the applicant's name, business email, business physical address, and business phone number for the purpose of processing the applicant's request for a COA. CADZ generates a unique number that tracks the application before its submission and a unique COA Number that tracks the application after its submission. For monthly reporting of accidents and incidents, applicants specify which UAS was involved, the number of flights conducted, operational hours, and the location of the accident or incident, including latitude and longitude. The reports also include the landing location, speed, and type of flight. Additionally, the report includes a written description of the incident in a text box and relevant photos as evidence.

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](#) which directs the FAA to integrate UAS safely into the NAS.

CADZ does not 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 uses data minimization techniques in addition to appropriate retention policies to reduce the privacy risk associated with this project. CADZ collects the minimal amount of



data to process a COA request.

The General Technology Management records are maintained in accordance with [NARA GRS 3.1 General Technology Management Records, approved November 2019](#). These records cover operations and maintenance of the basic systems and services used to supply the agency and its staff with access to computers and data telecommunication. These records are temporary and are destroyed when business use ceases. DAA-GRS-2013-0005-0004.

CADZ Certification of Waiver or Authorization records are maintained according to NARA-approved schedule [DAA-0237-2023-0004](#) which covers application approvals, denials, cancellations, UAS reporting, significant or unusual waivers or authorization, and all other support information/data. Records in CADZ are required to be kept for 3 years after the cutoff.

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 [DOT/FAA 854 - Small Unmanned Aircraft System \(sUAS\) Waivers and Authorizations](#), 88 FR 59566 (August 29, 2023). 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. 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.
2. To law enforcement, when necessary and relevant to an FAA enforcement activity.
3. To the National Transportation Safety Board (NTSB) in connection with its investigation responsibilities.
4. 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 responsible for threat detection in connection with critical infrastructure protection.



The FAA maintains monthly accident/incident reporting in CADZ in accordance with the Department's system of records [DOT/FAA 857 Accidents, Incidents, and Investigations](#) 88 FR 73070 – October 24, 2023.

In addition to those disclosures generally permitted 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 of DOT FAA as a routine use pursuant to 5 U.S.C. 552a(b)(3) as follows: System Specific Routine Uses:

1. To users of FAA's Skywatch system, including the Department of Defense (DoD), the Department of Homeland Security (DHS), the Department of Justice (DOJ) and other authorized government users, information on airman, aircraft and operator records available for their use in managing, tracking and reporting aviation-related security events.
2. To the NTSB investigators and NTSB medical officers who use the data in their efforts to determine the cause of transportation accidents and incidents.
3. To Medical Examiners or Coroners who use FAA toxicology results in their medical examiner's report.
4. To Federal, State, Local, and Tribal law enforcement and security agencies, information about airmen, when engaged in an official investigation or security threat assessment in which airmen are involved, or which affect the safety of transportation or national security.
5. To the Federal, State, local, Tribal, and foreign government agencies who use toxicology services provided by the FAA, information pertaining to the toxicology study requested by the agency.

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 \(December 29, 2010\)](#), [77 FR 42796 \(July 20, 2012\)](#), and [84 FR 55222 \(October 15, 2019\)](#).

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).

CADZ collects information from the applicant, who is responsible for reviewing and ensuring the accuracy of the information submitted under a COA application. Once a COA application is submitted, the COA Processor reviews the application for completeness and verifies that the application includes all required attachments. The COA Processor may



contact the applicant to correct inconsistencies found in the application. If the applicant identifies inconsistencies in an issued COA, the applicant must reach out to the COA Processor to update the issued COA application.

Regarding monthly reporting for UAS operations, accidents, or incidents conducted under the COA, the applicant edits this information while it is still in a draft form within the user dashboard. However, once the report is submitted, it cannot be edited by the user or the FAA.

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

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 in August 2013.

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 are 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, and 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 conducts periodic privacy compliance reviews of the FAADroneZone services relative to the requirements of OMB Circular A-130.

Responsible Official

Jennifer Audette
System Owner
Acting Manager, AUS-410

Approval and Signature

Karyn Gorman
Chief Privacy Officer
Office of the Chief Information Officer