Appendix A: Part 89 Notice of Identification (NOI) in FAADroneZone

Executive Summary

The Federal Aviation Administration (FAA) Office of Aviation Safety (AVS) owns and operates the Part 89 Notice of Identification system ("Part 89 NOI"). 14 C.F.R. § 89.130 has four requirements, three of which operators (who can be United States citizens, legal permanent residents, or foreigners) of foreign registered unmanned aircraft (UA) with remote identification (remote ID) must comply. The three requirements operators must comply with are: 1) submit a Notice of Identification (NOI) in a form and manner acceptable to the FAA Administrator, 2) maintain a Confirmation of Identification (COI) at the control station, and 3) ensure information in the NOI is updated and accurate. The fourth requirement is for FAA to issue COIs per § 89.130(b). The Part 89 NOI system allows operators of foreign registered UA with remote ID to comply with the requirements of 14 C.F.R. § 89.130 by submitting an NOI online and receiving an electronic COI, which serves as confirmation that FAA received the notice.

Part 89 NOI is part of the FAADroneZone services. This is an Appendix to the overarching Privacy Impact Assessment (PIA) for FAADroneZone. This PIA is being updated because System of Records Notice (SORN) DOT/FAA 801 Aviation Registration Records - 88 FR 53951 - August 9, 2023, was republished and National Archives and Records Administration (NARA) records retention schedule DAA-0237-2023-0007 was approved.

Introduction & System Overview

Unmanned aircraft (UA or drones) are the fastest growing segment of aviation in the United States. The Federal Aviation Administration (FAA) Reauthorization Act of 2018, Pub. L. No. 115-254 Sec. 347, Special Authority for Certain Unmanned Aircraft Systems, codified at 49 U.S.C. § 44807, directs the Secretary of Transportation to determine whether UAs operations posing the least amount of public risk and no threat to national security can safely be operated in the National Airspace System (NAS) and, if so, to establish the requirements for the safe operation of those systems in the NAS.

As a result, the FAA issued regulations, including Part 89, which require most UAs operating in US airspace to have remote ID capability. Remote ID provides information about UA in flight, such as the identity of the UA and the location and relative altitude of the UA, base station, and take-off site. Remote ID helps the FAA, law enforcement, and other federal agencies to find the control station when a drone appears to be flying in an unsafe manner or where it is not allowed to fly. 14 C.F.R. § 89.130 further requires that "[n]o person may operate a foreign registered civil unmanned aircraft with remote identification in the airspace of the United States unless, prior to the operation, the person submits a notice of identification in a form and manner acceptable to the Administrator." The FAA issues a COI upon completion of the notification requirements. In this way, the FAA's Part 89 NOI system allows operators of foreign registered UA with remote ID to comply with 14 C.F.R. § 89.130.

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Notice of Identification (NOI)

Once on the FAADroneZone website, users navigate to the Part 89 NOI service. To create the NOI, users then input the following information, required directly by 14 C.F.R. § 89.130:

- Name of the operator (individual or organization);
- Name of the operator's authorized representative, if applicable;
- Physical and mailing address of the operator;[1]
- Physical and mailing address of the operator's authorized representative, if applicable;
- Telephone number of the operator;
- Telephone number of the operator's authorized representative, if applicable;
- Email address of the operator;
- Email address of the operator's authorized representative, if applicable;
- UA manufacturer and model name;
- Serial number of the UA or remote ID broadcast module;
- Country of registration of the UA; and
- Foreign registration number.

Confirmation of Identification (COI)

Once the user submits the NOI information above, the Part 89 NOI system automatically generates and issues a COI number, which is a reference number specific to that notice. The COI serves as proof of compliance with 14 C.F.R. § 89.130. The COI can be viewed and printed from the FAADroneZone website, and a copy of the COI will also be sent to the email address(es) provided. The COI will contain the following elements:

- COI number;
- Operator's name;
- COI issuance date; and
- COI expiration date (one year from the date of issuance).

Fair Information Practice Principles (FIPPs) Analysis

The DOT PIA template is based on the fair information practice principles (FIPPs). The FIPPs, rooted in the tenets of the Privacy Act, are mirrored in the laws of many U.S. states, as well as many foreign nations and international organizations. The FIPPs provide a framework that will support DOT efforts to appropriately identify and mitigate privacy risk. The FIPPs-based analysis conducted by DOT is predicated on the privacy control families articulated in the Federal Enterprise Architecture Security and Privacy Profile (FEA-SPP) v3,[2] 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

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[1] The rules require the collection of a physical address. If the operator or authorized representative does not receive mail at the physical address, then a mailing address must also be provided.

[2] http://www.cio.gov/documents/FEA-Security-Privacy-Profile-v3-09-30-2010.pdf

the Privacy Controls articulated in Appendix J of the NIST Special Publication 800-53 Security and Privacy Controls for Federal Information Systems and Organizations.[3]

Transparency

Sections 522a(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 inform individuals of the purpose for which the FAA collects, uses, disseminates, and retains PII within the Part 89 NOI system.

DOT and FAA System of Records Notices (SORNs) provide transparency about privacy practices regarding the collection, use, sharing, safeguarding, maintenance, and disposal of information about individuals covered under the Privacy Act of 1974, as amended. The information in the Part 89 NOI system requires a SORN because the information stored in the system may be retrieved by COI number, the UA or broadcast module serial number, or the operator's name, and is covered by DOT/FAA 801 Aviation Registration Records - 88 FR 53951 - August 9, 2023.

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.

The publication of this PIA further demonstrates the Department of Transportation's commitment to providing appropriate transparency.

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 operators is voluntarily provided for the purpose of processing Part 89 NOI and COI. The operator fills out the form on the FAADroneZone website and is responsible for ensuring the accuracy of the information they provide to the FAA. When the operator creates their NOI, they can validate and edit the personal information they have entered prior to submitting the NOI. Once the NOI is submitted, the name of the operator cannot be changed or updated, but all other fields can be updated. If a name change is required, an NOI can be cancelled by the user and a new NOI can be created. The cancelled NOI is maintained as a record of change.

Under the provisions of the Privacy Act, individuals may request searches to determine

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[3] http://csrc.nist.gov/publications/drafts/800-53-Appdendix-J/IPDraft_800-53-privacy-appendix-J.pdf

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; and
- 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 Federal Aviation Administration (FAA) Reauthorization Act of 2018, Pub. L. No. 115-254 Sec. 347, Special Authority for Certain Unmanned Aircraft Systems, codified at 49 U.S.C. § 44807 directs the Secretary of Transportation to determine whether UAs operations posing the least amount of public risk and no threat to national security can safely be operated in the National Airspace System (NAS) and, if so, to establish the requirements for the safe operation of those systems in the NAS.

The FAA collects, uses and maintains information in the Part 89 NOI system under authority of 14 C.F.R. § 89.130, which requires that "[n]o person may operate a foreign registered civil unmanned aircraft with remote identification in the airspace of the United States unless, prior to the operation, the person submits a notice of identification in a form and manner acceptable to the Administrator."

Part 89 NOI data will be used by the FAA consistent with the purposes for which it was collected as described in SORN DOT/FAA 801 Aviation Registration Records - 88 FR 53951 - August 9, 2023.

The Part 89 NOI system collects and maintains the following PII about the operators of foreign registered UA with remote identification to comply with the requirements of 14 C.F.R. § 89.130: name of the operator, name of the operator's authorized representative (if applicable); physical and mailing address of the operator; physical and mailing address of the operator's authorized representative (if applicable); telephone number of

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the operator; telephone number of the operator's authorized representative (if applicable); email address of the operator; email address of the operator's authorized representative (if applicable); UA manufacturer and model name; serial number of the UA or remote identification broadcast module; country of registration of the UA; foreign registration number; and COI number.

The Part 89 NOI system internally shares all its data with Tableau, another FAA system. The purpose of this data exchange is to allow Tableau[4] to produce Part 89 NOI compliance reports.

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 minimizes its data maintenance, use, and retention in the Part 89 NOI system to the information that is relevant and necessary to meet its authorized business purpose. That purpose is to allow operators of foreign registered UA with remote ID to comply with the requirements of 14 C.F.R. § 89.130 by submitting a NOI online and receiving an electronic COI.

Records in Part 89 NOI are maintained in accordance with National Archives and Records Administration (NARA) records schedule DAA-0237-2023-0007 Item 3. Records are no longer collected after the operator notice is canceled or expires. Records are then maintained for three years after 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.

DOT discloses Part 89 NOI information outside DOT in accordance with DOT/FAA 801 Aviation Registration Records - 88 FR 53951 - August 9, 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 the Part 89 NOI system may be disclosed outside DOT as a routine use pursuant to 5 U.S.C. § 552a(b)(3) as follows:

- To the public (including government entities, title companies, financial institutions, international organizations, and others), when permitted, information, including aircraft owner's name, address, United States Registration Number, aircraft type, legal documents related to title or financing of an aircraft and ADB–S summary reports, in order to facilitate aviation safety, security, and commerce. Emails and telephone numbers of small unmanned aircraft system (sUAS) owners registered under 14 CFR part 48 will not be disclosed to the Public pursuant to this Routine Use.

[4] PIA for Tableau is available at https://www.transportation.gov/individuals/privacy/tableau.

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- 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.

DOT may also disclose Part 89 NOI information outside DOT pursuant to 15 additional routine uses applicable to all DOT Privacy Act systems of records. These routine uses are published in the *Federal Register* at 75 Fed. Reg. 82,132 (Dec. 29, 2010), 77 Fed. Reg. 42,796 (July 20, 2012), and 84 Fed. Reg. 55,222 (Oct. 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).

The user submitting an NOI is responsible for ensuring the accuracy of the information they provide to the FAA in the NOI. When they are creating the NOI, they can validate and edit the personal information they have entered prior to submitting the NOI. Once the NOI is submitted, the user cannot change the name of the operator, however, all other fields may be updated. If a new operator name is required, the user can cancel the NOI and create a new one. Individuals wishing to correct personal information have the right to do so under the Privacy Act and may contact the FAA Privacy Office using the address provided in the Individual Participation and Redress Section of this document.

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 Modernization Act (FISMA), Pub. L. 113-283 (Dec. 18, 2014) 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, of which Part 89 NOI is one, have a built-in time-out function and users are automatically logged out after 30 minutes of non-activity. In addition, all FAADroneZone services securely transmit information provided by the users through third

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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. The FAADroneZone and services were authorized to operate on August 13,2025.

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, as amended, 5 U.S.C. § 552a, the E-Government Act of 2002 (Public Law 107-347), the Federal Information Security Modernization Act (FISMA), Pub. L. 113-283 (Dec. 18, 2014), DOT privacy regulations (including DOT Privacy Risk Management Policy Order 1351.18), Office of Management and Budget (OMB) mandates, and other applicable DOT and FAA information and information technology management procedures and guidance.

In addition to these practices, additional policies and procedures will be consistently applied, especially as they relate to access, protection, retention, and destruction of PII. Federal and contract employees are given clear guidance in their duties as they relate to collecting, using, and processing privacy data. Guidance is provided in the form of mandatory annual security and privacy awareness training, as well as in FAA Order 1370.121B. 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

Karyn Gorman
Chief Privacy Officer KARYN MARIE GORMAN Digitally signed by KARYN MARIE GORMAN Date: 2026.10.22 14:36:02 -04'00'
Office of the Chief Information Officer

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