



## U.S. Department of Transportation

### Privacy Impact Assessment

Federal Aviation Administration (FAA)

Office of Information and Technology (AIT)

Unmanned Aircraft Systems Management Environment (UASME)

#### Responsible Official

Chris Nassif, AUS-410

System Owner, UAS Integration Office Program Manager

UAShelp@faa.gov

844-FLY-MY-UA

#### Reviewing Official

Claire W. Barrett

Chief Privacy & Information Asset Officer

Office of the Chief Information Officer

privacy@dot.gov



## Executive Summary

The Unmanned Aircraft Management System Environment (UASME) is a single-sign on solution specifically created to improve the customer experience and provide a single sign-on platform for small Unmanned Aircraft System (sUAS) owners or operators, whether flying under Section 336, Part 107, or flying sUAS over 55 lbs., to interact with the FAA and obtain guidance to operate within the rules and regulations of the National Airspace System (NAS). The UASME requires account creation and authenticates and provides access to the sUAS owners or operators to UASME applications. Additionally, the UASME provides a dashboard to authenticated users showing relevant information regarding submissions made to the FAA for regulated sUAS activities. Information provided may include a list of registered sUAS, status of waivers, authorizations and accident reports, and operational guidance. Access to the UASME is facilitated through the FAADroneZone (DZ) public-facing web portal (<https://www.dronezone.faa.gov>)

The UASME allows the FAA to group all of the sUAS front-end infrastructure and back-end applications used to manage the FAA's engagement of sUAS within the NAS. The FAA developed the UASME Privacy Impact Assessment (PIA) pursuant to Section 208 of the E-Government Act of 2002 because the DZ back-end applications require sUAS owners or operators to provide personally identifiable information (PII). This UASME PIA covers the front-end and all back-end applications with the exception of the Small Unmanned Aircraft Registration System (sUASRS). The back-end applications are discussed in the applicable appendices to this PIA and will henceforth be collectively referred to as the UASME applications.

## 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.<sup>1</sup>*

*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 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*

---

<sup>1</sup>Office 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).

- *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**

In 2012, Congress passed the Federal Aviation Administration (FAA) Modernization and Reform Act of 2012 (Public Law 112-95). Section 333 of Public Law 112-95 directed the Secretary of Transportation to determine which types of unmanned aircraft systems (UAS), because of their size, weight, speed, operational capability, proximity to airports and populated areas, and operation within visual line of sight, do not create a hazard to users of the national airspace system (NAS) or the public, or pose a threat to national security. Based on such determinations, the statute mandated the FAA to establish requirements for the safe operation of the UAS in the NAS.

The FAA issued the Operation and Certification of Small Unmanned Aircraft Systems final rule to enable certain small Unmanned Aircraft System (sUAS) operations to commence upon adoption of this rule and accommodate technologies as they evolve and mature (81 Federal Register (FR) 42063, June 28, 2016). In order to implement the requirements of the final rule, the initial support system for sUAS operations and activities resulted in systems that were not integrated and could not readily share data. As a result, users were required to log into multiple applications and provide redundant data in order to submit information necessary for the FAA to authorize sUAS operations.

Subsequently, the FAA has developed the Unmanned Aircraft Management System Environment (UASME) which includes FAADroneZone (DZ), a public facing web portal that houses current and future UASME applications including the Small Unmanned Aircraft System Registration System (sUASRS), the sUAS Part 107 Waiver and/or Airspace Authorization (Part 107 Waiver Authorization) requests, and sUAS Part 107 Accident Reporting (Part 107 Accident Reporting), which are subject to UAS oversight and provision. Additional applications may be added to the UASME in the future. This PIA will be updated as appropriate to address the privacy risks posed by any future applications.

The UASME was created to improve the customer experience and provide a single sign-in platform for FAA to engage with sUAS owners and operators for sUAS services. sUAS owners or operators, whether flying under Section 336, Part 107, or flying sUAS over 55 lbs., interact with the FAA and obtain guidance to operate within the rules and regulations of the NAS. The UASME facilitates the DZ account creation and authenticates and provides access to the sUAS owners or operators to the UASME applications available in the DZ. Additionally, users are provided a dashboard showing their information, which could include their registered sUAS information, a status of all applications submitted for waivers, authorizations and accident reports, and operation guidance. With the UASME, sUASRS data previously entered by the user is stored securely using encryption technology and then is used to automatically prepopulate applicant forms, thus increasing the speed and accuracy of requests.

### Create a DZ Account:

A sUAS owner or operator must first create a DZ account to access the UASME applications and register their sUAS.

In order to create a DZ account, the registrant must provide a user name, which is their e-mail address; and create a password, both of which are stored in the UASME. The FAA sends a verification e-mail to the e-mail address provided by the registrant that includes a link to the DZ landing page. Account registration is

complete once the validation link is clicked and the account activated.<sup>2</sup> Once a registrant has activated their DZ account, they can proceed to use any of the sUAS applications.

A sUAS owner or operator is not required to create a DZ account to see guidance for registering as an owner who flies Model Aircraft under Section 336 and/or as an owner who flies sUAS under Part 107. In addition, they can open links to more information about flying a sUAS device, becoming a sUAS pilot, registering a UAS over 55lbs., as well as view privacy statements, web policies, other government sites and contacts.

After the sUAS owner or operator creates a DZ account, they may choose to register under Section 336 or under Part 107.

#### *Registering to Fly a Model Aircraft under Section 336:*

Registrants choosing to fly under Section 336 select the *Fly a Model Aircraft under Section 336* option and provide their model aircraft registration information. Once registration is complete, the registration information is displayed on the dashboard within the DZ. The dashboard displays their sUAS name and address provided during DZ account creation, instructions on marking their sUAS, and safety guidance. The dashboard also provides convenient printing, e-mailing, and cancellation of their sUAS registration. The safety guidance provides safety parameters to flying under the Special Rule for Model Aircraft.

#### *Registering to Fly a sUAS under Part 107:*

Registrants choosing to fly under Part 107 must register their sUAS using the *Fly a sUAS under Part 107* application. Once completing registration, they may submit a request for a Part 107 Waiver or Authorization, file an accident report, and/or review the status of their sUAS in the dashboard.

The UASME retrieves data from the sUASRS, Part 107 Waiver or Authorization, and Part 107 Accident Reporting back-end applications and displays the owner's information and number of sUAS registered, number of organizational users, status of past and current Part 107 Waivers and Authorizations requests, and submitted Part 107 Accident Reports in the dashboard.

This UASME PIA covers the UASME applications with the exception of the sUASRS. For a full discussion of the UASME applications, see the applicable appendices at the end of this document.

## **Fair Information Practice Principles (FIPPs) Analysis**

*The DOT PIA template 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 FIPP 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<sup>3</sup>, 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 Organizations<sup>4</sup>.*

Transparency

---

<sup>2</sup> The link, used to validate the e-mail address provided, remains active for 24 hours; once expired, the registrant would need to reinitiate the account creation process.

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

<sup>4</sup> [http://csrc.nist.gov/publications/drafts/800-53-Appendix-J/IPDraft\\_800-53-privacy-appendix-J.pdf](http://csrc.nist.gov/publications/drafts/800-53-Appendix-J/IPDraft_800-53-privacy-appendix-J.pdf)

*Sections 522a(e)(3) and (e)(4) of the Privacy Act and Section 208 of the E-Government Act require public notice of an organization's information practices and the privacy impact of government programs and activities. Accordingly, DOT is open and transparent about policies, procedures, and technologies that directly affect individuals and/or their personally identifiable information (PII). Additionally, the Department should not maintain any system of records the existence of which is not known to the public.*

The FAA deploys multiple techniques to ensure that individuals are informed of the purpose for which the FAA collects, uses, disseminates, and retains personally identifiable information (PII) within the UASME. The UASME will maintains records on sUAS owners or operators, which are retrievable by the sUAS operator or owner's e-mail address. Please see the associated appendices for further explanation of each UASME application.

The Department of Transportation (DOT) has published the following Privacy Act System of Records Notice (SORN) providing notice to the public of its privacy practices regarding the collection, use, sharing, safeguarding, maintenance, and disposal of information about an individual that may be collected.

- DOT/ALL 13, *Internet/Intranet Activity and Access Records*, May 7, 2002 67 FR 30757 – provides notice to FAA employees, FAA contractors and sUAS owners or operators of records of account management.

This SORN addresses only the information collected during the registration process and does not cover UASME application information. Each UASME application is covered by a Privacy Act notice specific to that application and is identified as part of the application in its specific appendix to this document.

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 DZ landing page. Individuals are required to acknowledge that they have read and understood the statement, including all the terms and conditions of using the system, prior to proceeding with providing any information to create an account or profile.

The publication of this PIA further demonstrates DOT's commitment to provide appropriate transparency.

## **Individual Participation and Redress**

*DOT should provide 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 be provided reasonable access to their PII and the opportunity to have their PII corrected, amended, or deleted, as appropriate.*

All information within the UASME applications is voluntarily collected from the sUAS owners or operators. To facilitate access to the DZ and all UASME applications hosted on the DZ, the e-mail address and password are collected and used to create their DZ account. A verification e-mail is sent to the e-mail address provided by the sUAS owner or operator. The sUAS owner or operator logs in and may edit their e-mail address or change their password as needed. Please see the associated appendices associated with the specific UASME applications for collection, uses, and disclosures of the PII.

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., South West (SW)  
Washington, District of Columbia (DC) 20591

Included in the request must be the following:

- Name
- Mailing address
- Phone number and/or e-mail 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 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 Ave. SW  
Washington DC, 20591

Additional information about the Department's privacy program may be found at [www.transportation.gov/privacy](http://www.transportation.gov/privacy). Individuals may also contact the DOT Chief Privacy Officer at [privacy@dot.gov](mailto:privacy@dot.gov).

## **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 its collects, uses, maintains, or disseminates PII.*

Data in the system of records is used by DOT systems and security personnel or persons authorized to assist these personnel, to plan and manage systems services and otherwise perform their official duties. Such services would include, but are not limited to, analyzing engineering and statistical use data to assist in making business decisions regarding upgrading hardware, software, and communications technology to meet changing Internet/Intranet use requirements. The system is also used to monitor for improper use.

The UASME environment and associated UASME applications were developed to support the FAA's implementation of Public Law 112-95 Section 333, which directs the Secretary of Transportation to determine whether UAS operations posing the least amount of public risk and no threat to national security could safely be operated in the NAS and, if so, to establish the requirements for the safe operation of these systems in the NAS. To that end, the FAA issued different regulations, including the Operation and Certification of Small Unmanned Aircraft Systems final rule establishing requirements for the safe operation of the UAS in the NAS, which are located at 14 Code of Federal Regulations (C.F.R.) Part 107. UASME provides a single platform for sUAS owners or operators to register their sUAS, report accidents, and request waivers and authorizations as required by 14 C.F.R. Part 107, in furtherance of these regulations and of Public Law 112-95 Section 333. The authority for the specific UASME applications can be found in the appendices to this PIA.

The following authorities are applicable to the DZ and all UASME applications:

- 49 U.S.C. § 106(f), Authority of the Secretary and the Administrator
- 49 U.S.C. § 106(g), Duties and powers of Administrator
- 49 U.S.C. § 40101, Policy
- 49 U.S.C. § 40103, Sovereignty and use of airspace
- 49 U.S.C. § 40106, Emergency powers
- 49 U.S.C. § 40113, Administrative
- 49 U.S.C. § 44701, General requirements
- 49 U.S.C. § 46308, Interference with air navigation

## 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. DOT should retain PII for only as long as necessary to fulfill the specified purpose(s) and in accordance with a National Archives and Records Administration (NARA)-approved record disposition schedule.*

Individuals creating accounts with the DZ are responsible for the accuracy of information they provide during the process. The data elements collected by the FAA are the minimum necessary to comply the mission of the DZ. The e-mail address and password collected for DZ account registration and profile maintenance is the minimum required to establish unique accounts within the system, ensure appropriate access to applications, and maintain communications with registered individuals.

The DZ account information, will be retained and disposed of in accordance with National Archives and Records Administration, General Records Schedule 3.1, January 2017, *General Technology Management Records, item 12*. The records are deleted when related master file or database has been deleted, but longer retention is authorized if required for business use. Please see the associated appendices and associated PIAs for a full discussion of the minimization and retention policy for records related to the UASME applications.

## 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 sharing of DZ account registration and user activity logs in the UASME and UASME applications, is conducted in accordance with Department SORN DOT/ALL 13, Internet/Intranet Activity and Access Records, May 7, 2002 67 FR 30758. 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 pursuant to 5 U.S.C. § 552a(b)(3) as follows:

- To provide information to any person(s) authorized to assist in an approved investigation of improper access or usage of DOT computer systems.
- To an actual or potential party or his or her authorized representative for the purpose of negotiation or discussion of such matters as settlement of the case or matter, or informal discovery proceedings.
- To contractors, grantees, experts, consultants, detailees, and other non-DOT employees performing or working on a contract, service, grant cooperative agreement, or other assignment from the

Federal government, when necessary to accomplish an agency function related to this system of records.

- To other government agencies where required by law.

The Department has also published 14 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, and 77 FR 42796, July 20, 2012, under “Prefatory Statement of General Routine Uses” (available at <http://www.transportation.gov/privacy/privacyactnotices>). Sharing of Privacy Act records collected, used, and maintained as part of the back-end applications is discussed in the associated appendices for the back-end applications.

### 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).*

Registrants are responsible for ensuring the accuracy of their e-mail address and password at the time they create their DZ account. Once the account is complete, individuals may log-in to the system and change/update their e-mail address and password as needed.

The data quality and integrity needs of the UASME applications is discussed in the applicable appendices.

### Security

*DOT shall implement administrative, technical, and physical measures protect PII collected or maintained by the Department against loss, unauthorized access, or disclosure, as required by the Privacy Act, and to ensure that organizational planning and responses to privacy incidents comply with OMB policies and guidance.*

The FAA protects PII with reasonable security safeguards against loss or unauthorized access, destruction, usage, modification, or disclosure. These safeguards incorporate standards and practices required for federal information systems under the Federal Information Security Management Act (FISMA) and are detailed in Federal Information Processing Standards (FIPS) Publication 200, Minimum Security Requirements for Federal Information and Information Systems, dated March 2006, and National Institute of Standards and Technology (NIST) Special Publication (SP) 800-53, Revision 4, Security and Privacy Controls for Federal Information Systems and Organizations, dated April 2013.

The DZ and UASME applications have a built in time-out function and sUAS owners or operators are automatically logged out after 30 minutes of non-activity. In addition, all UASME applications securely transmit information provided by the sUAS owners or operators using third party authentication services, which protect the data using Hypertext Transfer Protocol encrypted by Transport Layer Security/Secure Sockets Layer. The UASME applications are hosted in Amazon Web Services (AWS) United States East/West Public Cloud, which is a Federal Risk and Authorization Management Program Compliant Cloud Service Provider, meeting Moderate Federal Risk and Authorization Management Program security requirements. AWS received its Authority to Operate from the U.S. Department of Health and Human Services on August 2013. The UASME was authorized to operate on January 3, 2018.



## 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 1370.121 implements the various privacy requirements of the Privacy Act of 1974 (the Privacy Act), the E-Government Act of 2002 (Public Law 107-347), the FISMA, DOT privacy regulations including DOT Privacy Risk Management Policy Order 1351.18, Office of Management and Budget (OMB) mandates, and other applicable DOT and FAA information and information technology management procedures and guidance.

In addition to these practices, additional policies and procedures will be consistently applied, especially as they relate to access, protection, retention, and destruction of PII. Federal and contract employees are given clear guidance in their duties as they relate to collecting, using, processing privacy data. Guidance is provided in the form of mandatory annual security and privacy awareness training, as well as FAA Order 1370.12.1. The FAA will conduct periodic privacy compliance reviews of the UASME applications relative to the requirements of OMB Circular A-130.

## Responsible Official

Chris Nassif, AUS-410

System Owner, UAS Integration Office Program Manager

[UAShelp@faa.gov](mailto:UAShelp@faa.gov)

844-FLY-MY-UA

## Approval and Signature

Claire W. Barrett

Chief Privacy & Information Asset Officer

Office of the Chief Information Officer

## Appendix A - Small Unmanned Aircraft System (sUAS) Part 107 Waiver and/or Airspace Authorization Application (Part 107 Waiver Authorization)

### **Executive Overview:**

The small unmanned Aircraft System Part 107 Waiver and/or Airspace Authorization application (Part 107 Waiver Authorization) application, allows sUAS owners or operators to apply for a Part 107 Airspace Authorization, Part 107 Airspace Waiver and/or Part 107 Operational Waiver to fly outside the requirements of the sUAS Part 107 Rule and within the National Airspace System (NAS) and to submit requests for Part 107 Waivers and/or Part 107 Authorizations to the Federal Aviation Administration (FAA). FAA employees and contractors (FAA Analysts) will use the data collected from sUAS owners or operators in this application to process requests for airspace Waivers and Authorizations.

### **Introduction and System Overview:**

Under 14 Code of Federal Regulations (C.F.R.) Part 107, a pilot flying a sUAS under the sUAS rule must be at least 16 years old, must pass an initial aeronautical knowledge test at an FAA-approved knowledge testing center<sup>5</sup>, and must be vetted by the Transportation Safety Administration<sup>6</sup>. Additionally, under 14 C.F.R. Part 107, the sUAS must weigh less than 55 lbs. and must be registered with the FAA.

sUAS owners or operators that want to fly outside of the above described Part 107 restrictions and can provide a sufficient description in the online request that they can operate a sUAS safely outside of the restrictions, will be able to request a Part 107 Airspace Authorization or Part 107 Airspace Certificate of Waiver from the FAA using the Part 107 Waiver Authorization application. This application is an electronic version of Form 7711-1.<sup>7</sup>

### **Applying for a sUAS Part 107 Waiver or Authorization for a sUAS Operator operating under Part 107:**

Once authenticated to the DZ, the sUAS owner or operator navigates to the Part 107 Waiver Authorization portion of the DZ where they can apply for a Part 107 Airspace Authorization, Part 107 Airspace Waiver and/or Part 107 Operational Waiver, and selects the appropriate application. At this point, they have the opportunity to read the Privacy Act statement and acknowledge that they understand all the terms and conditions of using the application prior to proceeding. Additionally, they may review the Waivers Safety Explanation Guidelines, Waiver Application Instructions, and 14 C.F.R. 107.200. The Part 107 Waiver Authorization application automatically prepopulates the following information via an electronic data exchange with the sUASRS Certificate of Waiver or Authorization:<sup>8</sup> sUAS owner or operator's profile information including the name/organizational name, e-mail address, telephone number, and mailing address. Next, the sUAS operator enters their address which is then electronically verified by SmartyStreet. If the address cannot be verified through SmartyStreet as valid, an error message is displayed and the user cannot proceed with the submission. If the address can be verified, the sUAS owner or operator is allowed to continue. For all three requests (except where noted below), the sUAS operator continues to fill out the remainder of the application entering the following PII:

---

<sup>5</sup> A person who already holds a pilot certificate issued under 14 C.F.R. Part 61 and has successfully completed a flight review within the previous 24 months can complete a Part 107 online training course at <https://www.faasafety.gov/> to satisfy this requirement.

<sup>6</sup> For TSA vetting process, see [https://www.flightsafety.com/fs\\_tsa\\_index.php](https://www.flightsafety.com/fs_tsa_index.php).

<sup>7</sup> OMB Control Number: 2120-0768.

<sup>8</sup> The Certificate of Waiver or Authorization is also called the 7711-1 Form, which has a valid OMB control number (2120-0768).

- Remote Pilot Certificate Number (optional)
- Alternate E-mail Address (optional)
- sUASRS Registration Number (optional)
- sUAS Make and Model (optional)
- Location of Proposed Operation (free text)
- Description of Proposed Operation (free text)
- Justification that the operation is safe under the terms of the waiver (free text)

Once the sUAS operator enters the information and submits the request, a unique reference number (13 alphanumeric number created by the FAA) is generated and the request is automatically routed into the Part 107 Waiver Authorization application for processing. The reference number is used to identify the request. This reference number is available to both FAA Analysts and sUAS owners or operators.

#### Processing a sUAS Part 107 Waiver or Authorization Request by FAA:

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

The FAA Analyst can take the following actions for a request: Approve with Full Grant, Approve with Partial Grant, Deny Request, Cancel Request, or Request for more Information (RFI). The analyst starts processing the request by reviewing the sUAS owner or operator's provided information (name/organizational name, e-mail address, telephone number, and mailing address), as submitted by the sUAS operator.

The PII used in a request does not itself determine if a sUAS owner or operator gets approved or denied. The collected PII only identifies the person, and/or organization that is making the request and the equipment being used. Non-PII data, such as type of flight, location, and reason for flight, determines approval or denial.

#### Approve with Full Grant:

The FAA Analyst will see a list of all requests awaiting to be processed. The FAA Analyst checks out a request and begins to process the request. The FAA Analyst reviews all data, makes any necessary edits; for example, adding an airport code, altitude, operational dates, or other operational parameters, if required, assigns the reason for approval, and sends the Form 7711-1 to the FAA manager for review. The FAA manager reviews, and if they do not agree with the approval of the request as a result of incomplete information, insufficient safety explanation, or other operational reasons, they can deny the request at which time the manager would send the request back to the FAA Analyst for denial processing (see Deny Request process below). If the manager agrees with the approval with full grant, they add their electronic signature, which completes and approves the request.

#### Approve with Partial Grant:

In order to approve with partial grant, the FAA manager reviews the request. If they do not agree with the approval of the partial grant as a result of incomplete information, insufficient safety explanation, or other

operational reasons, they can deny the request. At which time the manager would send the request back to the FAA Analyst for denial processing (see Deny Request process below). If the manager agrees with the approval with partial grant, they add their electronic signature which completes and approves the request.

#### Deny Request:

The FAA Analyst can make a determination to deny a request based on incomplete information, insufficient safety explanation, or other operational reasons. The FAA Analyst adds the reason for the denial and sends the denial letter to the FAA manager for review. The FAA manager reviews and adds their electronic signature, which completes the request.

#### Cancel Request:

The FAA Analyst can cancel a request based on a sUAS owner or operator's initiated cancellation request, class G airspace, duplicate request, elapsed dates, incorrect waiver or authorization request type, waiver not required, or the request is already combined with another request. The FAA Analyst adds the reason for the request cancellation, which completes the request.

#### Request for Information (RFI)

The FAA Analyst may determine that additional information is needed. Requests for additional information are made via e-mail from official e-mail accounts sent to the sUAS owner or operator's contact information on record. Examples of additional information requests include; picture of the proposed area or clarification on latitude or longitude. The request does not include a request for any additional PII. Once the FAA Analyst receives the requested information, it is uploaded or manually entered, as appropriate, into the Part 107 Waiver Authorization application. Once the FAA Analyst receives the requested information, the request is reopened and continues through the approval, cancelation, or denial process.

For all determinations, the Part 107 Waiver Authorization application automatically sends a generic e-mail to the sUAS owner or operator that instructs them to log back into the DZ and view the status of their request. The sUAS owner or operator is not required to take any action at that point; however, if the sUAS owner or operator decides to log back into the Part 107 Waiver Authorization application, they can review the status of their request. Additionally, they can download the approved request as a Portable Document Format for their own records. There is no print capability within the Part 107 Waiver Authorization application.

In addition to the DZ, the FAA has partnered with industry and UAS Service Suppliers (USS) to create and resource a technological solution that allows for data exchange between sUAS owners or operators and the FAA. This solution, known as the Low Altitude Authorization and Notification Capability (LAANC) automates airspace authorizations and notifications submitted by sUAS owners or operators. All authorizations approved via the LAANC solution are forwarded to and maintained in the Part 107 Waiver Authorization application. For complete details on LAANC, please see the LAANC PIA available at <https://www.transportation.gov/individuals/privacy/privacy-impact-assessments>.

#### Transparency:

The FAA deploys multiple techniques to ensure that individuals are informed of the purpose for which the FAA collects, uses, disseminates, and retains PII within the Part 107 Waiver Authorization application. The application will maintain records by a sUAS owner or operator's name and other personal identifiers.

The Department of Transportation (DOT) has published the Privacy Act System of Records Notice (SORN), DOT/FAA 854, *Requests for Waivers and Authorizations Under 14 C.F.R. Part 107*, August 2,

2016 81 FR 50789 which provides notice to Part 107 owners or operators related to waivers and authorizations.

The Operation and Certification of Small Unmanned Aircraft Systems Final Rule (81 Federal Register 42063, June 28, 2016) serves as an additional public notice of the FAA's information practices and the privacy impact of the program.

As required by law, a Privacy Act statement discussing the Department's privacy practices regarding the collection, use, sharing, safeguarding, maintenance, and disposal of PII is publicly available on the website at the point of collection. Individuals have the opportunity to read the statement and then must agree that they understand all the terms and conditions of using the application prior to proceeding with providing any information to create an account or profile.

#### **Individual Participation and Redress:**

Information collected from sUAS owners or operators is voluntarily provided for the purpose of processing Part 107 airspace waiver and authorization requests. The Part 107 Waiver Authorization application automatically prepopulates the following information, via an electronic data exchange with the sUASRS application, into the online electronic Form 7711-1: sUAS owner or operator's profile information including the name/organizational name, e-mail address, telephone number, and address. Next, the sUAS operator continues to fill out the remainder of the Form 7711-1 by entering on the website: the Remote Pilot Certificate Number (optional), alternate e-mail address (optional), sUASRS Registration Number (optional), sUAS make and model (optional), the location and description of proposed operation, and the details of the justification that the operation is safe under the terms of the waiver. A unique reference number is generated and is used to track the request. The sUAS owner or operator is responsible for the accuracy of the information they enter. There is a possibility that the sUAS owner or operator may enter incorrect information or that the prepopulated information contained in the application may be different. The sUAS owner or operator has the ability to update/edit the information until the request is submitted. Once the request has been submitted, the sUAS owner or operator cannot change any information within the request. However, they have the ability to contact the waivers office and request that information be updated or cancelled. Upon receipt of the request, the FAA can make the changes or not. Once the FAA approves a Part 107 airspace waiver or authorization, the sUAS owner or operator additionally has the ability to update or correct any erroneous PII provided on the request by logging into the system, retrieving the request by the unique reference number, and making any desired updates. If the request is not approved, the sUAS owner or operator will be given an opportunity to resubmit the request, including any necessary updates to PII provided on the request.

For additional information on individual participation and redress, including instructions on making a request for access or amendment of records under the Privacy Act, please refer to the Individual Participation and Redress section of the principal UASME PIA above.

#### **Purpose Specification:**

Pursuant to Public Law 112-95 Section 333, the Secretary of Transportation was directed to determine whether UAS operations posing the least amount of public risk and no threat to national security could safely be operated in the NAS and, if so, to establish the requirements for the safe operation of these systems in the NAS. To that end, the FAA issued different regulations, including the Operation and Certification of Small Unmanned Aircraft Systems final rule establishing requirements for the safe operation of the UAS in the NAS, which are located at 14 C.F.R. Part 107.

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

The purpose of this application is to receive, evaluate, and respond to requests for authorization to operate a sUAS, pursuant to 14 C.F.R. Part 107, in Class B, C, or D airspace or within the lateral boundaries of the surface area of Class E airspace designated for an airport, and evaluate requests for a certificate of waiver to deviate safely from one or more sUAS operational requirements specified in part 107. The FAA also will use this application to support FAA safety programs and agency management, including safety studies and assessments. The FAA may use contact information provided with requests for waiver or authorization to provide sUAS owners and operators information about potential unsafe conditions and educate sUAS owners or operators regarding safety requirements for operation. The FAA also will use this application to maintain oversight of FAA issued waiver or authorizations, and records from this application may be used by FAA for enforcement purposes.

#### **Data Minimization and Retention:**

Within the RFI process the FAA may determine additional information is needed before a waiver or airspace authorization decision can be rendered. At that time, the FAA Analyst may send an e-mail from their organizational e-mail to the sUAS owner or operator specifically requesting additional information. For example, they may need a picture of the proposed area or clarification on latitude or longitude. The request does not include a request for any additional PII. The RFI sent from the FAA Analyst to the sUAS owner or operator only includes the sUAS owner or operators e-mail address, the non-PII request, and does not include any additional PII. The information requested is related to the Part 107 operational request and not the individual.

The records associated with the Part 107 Waiver Authorization proposes to manage records in accordance with pending National Archives and Records Administration (NARA) Records Disposition Authority DAA-0237-2016-0019-004. Under the proposed schedule the FAA would maintain records for two years, along with supporting data, after the date of denial or expiration, as appropriate. Until the disposition authority has been approved, these records will be maintained as permanent records.

#### **Use Limitation:**

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 application may be disclosed outside DOT as a routine use pursuant to 5 U.S.C. § 552a(b)(3) as provided in the SORN that applies to those records.

DOT/FAA 854 applies to records collected in connection with Part 107 waivers and authorizations. This SORN is currently being revised. Until the revised SORN 854 is published, the routine uses listed below, which are contained in the current published version of SORN 854, will apply. Once the revised SORN 854 is published, the FAA will disclose information covered by SORN 854 in accordance with those revised routine uses.

1. To the public, waiver and airspace authorization applications and decisions, including any history of previous, pending, existing, or denied requests for waivers and authorizations applicable to the small UAS at issue for purposes of the waiver, and special provisions applicable to the small UAS operation that is the subject of the request. E-mail addresses and telephone numbers will not be

disclosed pursuant to this Routine Use. Airspace authorizations the FAA issues pursuant to 14 C.F.R. 107.41 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 a FAA enforcement activity.
3. The Department has also published general routine uses applicable to all DOT Privacy Act systems of records, including this system. These routine uses are published in the Federal Register at 75 FR 82132, December 29, 2010, and 77 FR 42796, July 20, 2012, under “Prefatory Statement of General Routine Uses” (available at <http://www.transportation.gov/privacy/privacyactnotices>).

The FAA will make the details of approved waiver or authorization requests available to the public at [https://www.faa.gov/uas/request\\_waiver/waivers\\_granted](https://www.faa.gov/uas/request_waiver/waivers_granted). The PII contained in the waiver that is available to the public is limited to the organizational name, responsible person name, and address of waiver applicant. Certain authorizations, such as *Operations in Certain Airspace* authorizations will not be disclosed to the public on the website.

### **Data Quality and Integrity**

The sUAS owner or operator is responsible for the accuracy of the information they enter. There is a possibility that the sUAS owner or operator may enter incorrect information. The sUAS owner or operator cannot change the request once it has been submitted. However, at any time the sUAS owner or operator has the ability to call or e-mail the UAS Registration Help Desk<sup>9</sup> and ask that their request be updated or cancelled. Upon receipt of the request, the FAA can make the changes or not. Once the FAA approves a Part 107 airspace waiver or authorization, the sUAS owner or operator additionally has the ability to update or correct any erroneous PII provided on the request by logging into the application, retrieving the request by the unique reference number, and making any desired updates. If the request is not approved, the sUAS operator will be given an opportunity to resubmit the request, including any necessary updates to PII provided on the request.

---

<sup>9</sup> <https://www.faa.gov/uas/contact/>

## Appendix B - Small Unmanned Aircraft System (sUAS) Part 107 Accident Reporting Application

### **Executive Overview**

The Small Unmanned Aircraft System Part 107 Accident Reporting application (sUAS Part 107 Accident Reporting) allows sUAS owners or operators to submit a Part 107 accident report. FAA employees and contractors (FAA Analysts) will use the data collected from sUAS owners or operators in this application to process the submitted accident reports.

### **Introduction and System Overview**

As part of its safety mission, the FAA collects and reviews aircraft accident data and uses that data to promulgate rules, develop aviation safety outreach programs that improve aviation safety, and investigate potential violations of FAA regulations. For the first release of the Part 107 Accident Reporting application, only sUAS owners or operators that are required to file a sUAS accident report under Part 107, will be able to file a report using this application. Future releases will accommodate any individuals wishing to report a sUAS accident. 14 C.F.R. §107.9 requires that a sUAS owner or operator report to the FAA within 10 days the following types of sUAS accidents:

1. Serious injury to any person or any loss of consciousness, or
2. Damage to any property, other than the small unmanned aircraft, unless the cost of repair (including materials and labor) or fair market value in the event of total loss does not exceed \$500.

### **Reporting a sUAS Accident under Part 107:**

Once authenticated to the DZ, the individual navigates to the Part 107 Accident Reporting application to report a sUAS accident. The sUAS owner or operator fills out the online electronic form<sup>10</sup> on the website entering the following PII:

- Full Name (individual reporting the sUAS accident)
- Telephone Number
- E-mail Address
- Remote Pilot Certificate Number (optional)
- Small Unmanned Aircraft Systems Registration Service (sUASRS) Registration Number (optional)
- Additional Operational Details<sup>11</sup> (Free Text)
- Location of Accident<sup>12</sup> [City, State (required), and Zip Code]

Once the sUAS operator enters the information above, they select the type damage, whether serious injury or death or property damage greater than \$500, and submits the electronic form, a unique accident report reference number is generated. A confirmation page is displayed that includes the unique accident report reference number. The unique accident report reference number is used to identify the accident report. This

<sup>10</sup> OMB Control Number: 2120-0767, Expiration Date: 08/31/2019

<sup>11</sup> The free text can include sUAS operator name, the circumstances leading to the accident, injuries, and whether any property was damaged and the extent of damage.

<sup>12</sup> The accident could occur in a field, for example, vs an exact address, so only the City, State, and Zip Code is collected.



reference number is available to both FAA Analysts and only the sUAS owner or operator that filed the report.

#### Processing an Accident Report under Part 107:

The Part 107 Accident Reporting application is strictly used as a repository for sUAS accident reports. Once the sUAS owner or operator submits the accident report, a copy is saved in the Part 107 Accident Reporting application. Additionally, a copy of the accident report is automatically e-mailed to the FAA Regional Operations Center and to the sUAS Program accident reporting mailbox.

#### Transparency:

The FAA deploys multiple techniques to ensure that individuals are informed of the purpose for which the FAA collects, uses, disseminates, and retains PII within the Part 107 Accident Reporting application. The application will store and retrieve records by the unique accident report reference number.

The Department of Transportation (DOT) has published the Privacy Act System of Records Notice (SORN) DOT/FAA 847, *Aviation Records on Individuals*, November 9, 2010 75 FR 68849, which provides notice of aviation records on individuals that are required to be maintained about FAA's oversight and enforcement of compliance with safety regulations and statutes and orders issued thereunder.

As required by law, a Privacy Act statement discussing the Department's privacy practices regarding the collection, use, sharing, safeguarding, maintenance, and disposal of PII is publicly available on the website at the point of collection. Individuals reporting a sUAS accident have the opportunity to read the statement and then must agree that they understand all the terms and conditions of using the application prior to proceeding with providing any information to create an account or profile.

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

#### Individual Participation and Redress

Information collected from sUAS owners or operators is voluntarily provided for the purpose of processing Part 107 accident reports. The sUAS owner or operator fills out the form on the website, including the name/organizational name, e-mail address, telephone number, address, Remote Pilot Certificate Number (optional), sUASRS Registration Number (optional), additional operational details, and the location of accident [city, state (required), and zip code]. The sUAS owner or operator reporting a sUAS accident is responsible for ensuring the accuracy of the information they provide to the FAA in the accident report. When the sUAS owner or operator is creating their report, they have the opportunity to validate or edit the personal information they have entered prior to submitting the accident report. The Part 107 Accident Reporting application is strictly used as a repository for sUAS accident reports and once the report is submitted, it cannot be changed or updated.

In accordance with SORN DOT/FAA 847, records in this system that relate to administrative actions and legal enforcement actions are exempted from certain access and disclosure requirements of the Privacy Act, pursuant to 5 United States Code § 552a(k)(2).

For additional information on individual participation and redress, including instructions on making a request for access or amendment of records under the Privacy Act, please refer to the Individual Participation and Redress section of the principal UASME PIA above.

**Purpose Specification:**

The purpose of this application is to ensure proper oversight of sUAS operations including the requirement that a remote pilot in command must report to the FAA any sUAS operation that results in: (1) At least serious injury to any person or any loss of consciousness; or (2) damage to any property, other than the small unmanned aircraft, unless the cost of repair (including materials and labor) or fair market value in the event of total loss does not exceed \$500.

Pursuant to Public Law 112-95 Section 333, the Secretary of Transportation was directed to determine whether UAS operations posing the least amount of public risk and no threat to national security could safely be operated in the National Airspace System (NAS) and, if so, to establish the requirements for the safe operation of these systems in the NAS. To that end the FAA issued different regulations, including the Operation and Certification of Small Unmanned Aircraft Systems final rule establishing requirements for the safe operation of the UAS in the NAS, which are located at 14 Code of Federal Regulations (C.F.R.) Part 107. Pursuant to 14 C.F.R. §107.9, a remote pilot in command must report to the FAA, no later than 10 calendar days, any operation of the sUAS involving at least serious injury to any person or any loss of consciousness; or operations involving damage to any property, other than the sUAS, unless one of the following conditions is satisfied: (1) The cost of repair (including materials and labor) does not exceed \$500 or (2) the fair market value of the property does not exceed \$500 in the event of total loss.

PII collected during the sUAS accident reporting process is used for enforcement and oversight purposes to enable FAA inspectors to identify those involved with sUAS accidents. The FAA may also use the PII information provided within accident reports to provide information about potential unsafe conditions to sUAS owners or operators and to educate them regarding safety requirements for operation. The FAA will also use this application to support FAA safety programs and agency management, including safety studies and assessments. Additionally, the FAA will use this application to maintain oversight of FAA-issued authorizations, and records from this application may be used by FAA for enforcement purposes.

The FAA will collect the minimum amount of PII necessary to know who to contact with follow-up questions or as part of a follow-up investigation. In addition to determining compliance with FAA regulations, the FAA will incorporate the accident report into the Part 107 Accident Reporting application for aviation safety analyses. The FAA will not disseminate PII contained in the accident report to the public, except to the extent required by law.

**Data Minimization and Retention**

The FAA will collect the minimum amount of PII necessary. FAA collects the e-mail address, name, telephone number and location of the accident. Optional fields include remote pilot certificate number, alternate e-mail address, sUASRS registration number, sUAS make and model, and location of accident. The FAA will use the above PII information to contact the individual with follow-up questions or as part of a follow-up investigation.

The National Archives and Records Administration (NARA) has previously approved a records schedule for paper-based Part 107 accident reports, see Records Disposition Authority DAA-017-0012. The FAA plans to seek NARA approval expand the scope of the approved schedule to include accident reports submitted via this application. Once approved, the FAA would transfer records to Federal Records Center when 3 years old, and would destroy the records when 8 years old. Until the disposition authority has been approved, these records will be maintained as permanent records.

### **Use Limitation**

The DOT/FAA 847, *Aviation Records on Individuals*, November 9, 2010 75 FR 68849, provides notice of aviation records on individual that are required to be maintained in connection with FAA's oversight and enforcement of compliance with safety regulations and statutes and orders issued thereunder. 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 pursuant to 5 U.S.C. § 552a(b)(3) DOT/FAA 847. These routine uses include the following:

- Use contact information to inform airmen of meetings and seminars conducted by the FAA regarding aviation safety.
- Disclose information to the National Transportation Safety Board (NTSB) in connection with its investigation responsibilities.
- Provide information about airmen to Federal, State, local and Tribal law enforcement agencies when engaged in an official investigation in which an airman is involved.
- Provide information about enforcement actions or orders issued thereunder to government agencies, the aviation industry, and the public upon request.
- Provide information about airmen to Federal, State, local, and Tribal law enforcement, national security or homeland security agencies whenever such agencies are engaged in the performance of threat assessments affecting the safety of transportation or national security.

The Department has also published 14 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, and 77 FR 42796, July 20, 2012, under "Prefatory Statement of General Routine Uses" (available at <http://www.transportation.gov/privacy/privacyactnotices>).

### **Data Quality and Integrity**

The individual reporting a sUAS accident is responsible for ensuring the accuracy of the information they provide to the FAA in the accident report. When they are creating their report, they have the opportunity to validate or edit the personal information they have entered prior to submitting the accident. Once the accident is submitted, the individual reporting a sUAS accident cannot change the report.

For information related to Security and Accountability and Auditing, please refer to those sections in the principal UASME PIA above.

## Appendix C: Small Unmanned Aircraft Registration System

### Executive Overview

The Aircraft Registration System, also known as the Aircraft Registry or AVS Registry, was developed to help the Federal Aviation Administration (FAA) 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 was 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 on individuals registering aircraft - see Airmen/ Aircraft Registry Modernization System. This updated PIA for the aircraft registration portion of the Aircraft Registry is being published because the FAA is adding additional web-based capabilities to facilitate the registration of small Unmanned Aircraft Systems (sUAS) under a new Part 48 of title 14, Code of Federal Regulations; the airmen portion of the AVS Registry will be addressed in a separate PIA.

The complete Aircraft Registration PIA is available at <https://www.transportation.gov/individuals/privacy/privacy-impact-assessment-faa-office-aviation-safety-aircraft-registration>.<sup>13</sup>

---

<sup>13</sup> Since the publication of the sUAS Registration PIA, statutory authority for sUAS Registration for sUAS operating under Pub. L. 112-95 Section 336 was included in the National Defense Authorization Act for Fiscal Year 2018, Pub. L. No. 115-91 Section 1092(d).