

FAA Announces UAS Registration Task Force, Issues Request for Information

October 21, 2015

This week, the U.S. Department of Transportation (DOT) and Federal Aviation Administration (FAA) announced the establishment of a task force to develop a registration process for unmanned aircraft systems (UAS). The task force, which will be comprised of 25 to 30 representatives from the UAS and manned aviation industries, the federal government, and other stakeholders, will develop recommendations for implementing a UAS registration process that would apply to all UAS users, including hobbyists. One goal of the task force is to establish a streamlined system to make registration less burdensome for commercial UAS operators. Currently, commercial operators are required to use the N-number registration process applicable to manned aircraft.

Secretary of Transportation Anthony Foxx has directed the task force to deliver its report of recommendations by November 20, 2015 and announced in a recent press conference that the FAA intends to have the process in place by mid-December 2015.

To aid the task force, the FAA has released a Request for Information Regarding Electronic Registration for UAS asking for comment on the following ten questions:

1. What methods are available for identifying individual products? Does every UAS sold have an individual serial number? Is there another method for identifying individual products sold without serial numbers or those built from kits?
2. At what point should registration occur (e.g. point-of-sale or prior-to-operation)? How should transfers of ownership be addressed in registration?

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3. If registration occurs at point-of-sale, who should be responsible for submission of the data? What burdens would be placed on vendors of UAS if DOT required registration to occur at point-of-sale? What are the advantages of a point-of-sale approach relative to a prior-to-operation approach?
4. Consistent with past practice of discretion, should certain UAS be excluded from registration based on performance capabilities or other characteristics that could be associated with safety risk, such as weight, speed, altitude operating limitations, duration of flight? If so, please submit information or data to help support the suggestions, and whether any other criteria should be considered.
5. How should a registration process be designed to minimize burdens and best protect innovation and encourage growth in the UAS industry?
6. Should the registration be electronic or web-based? Are there existing tools that could support an electronic registration process?
7. What types of information should be collected during the registration process to positively identify the aircraft owner and aircraft?
8. How should the registration data be stored? Who should have access to the registration data? How should the data be used?
9. Should a registration fee be collected and if so, how will the registration fee be collected if registration occurs at point-of-sale? Are there payment services that can be leveraged to assist (e.g. PayPal)?
10. Are there additional means beyond aircraft registration to encourage accountability and responsible use of UAS?

Comments will be due fifteen days after publication in the Federal Register, which is currently scheduled to occur on October 22, 2015.

For more information, please contact R. Michael Senkowski, Anna M. Gomez, Katy J. Milner, or Sara M. Baxenberg.