

**BEFORE THE
DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION
WASHINGTON, D.C.**

IN THE MATTER OF

**Request for Comments; Clearance of a New Approval of Information
Collection: Federal Aviation Administration Unmanned Aircraft Systems
Support Center Case Management System**

Docket No. FAA-2021-0466

COMMENTS OF THE SMALL UAV COALITION

**Gregory S. Walden
Dentons Global Advisors Government Relations LLC
1900 K Street NW
Washington, DC 20006
*Counsel to the Small UAV Coalition***

August 23, 2022

Filed with www.regulations.gov

**BEFORE THE
DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION
WASHINGTON, D.C.**

IN THE MATTER OF

**Request for Comments; Clearance of a New Approval of Information
Collection: Federal Aviation Administration Unmanned Aircraft Systems
Support Center Case Management System**

Docket No. FAA-2021-0466

COMMENTS OF THE SMALL UAV COALITION

The Small UAV Coalition¹ is pleased to provide its comments in support of the Office of Management and Budget (“OMB”) clearance of the above-captioned new information collection for the FAA to create and operate a FAA UAS Support Center Case Management System (“CMS”). 87 Fed. Reg. 44486 (July 26, 2022). As the Coalition stated in its August 6, 2021, comments to the initial Federal Register notice, 86 Fed. Reg. 30368 (June 7, 2021):

The Coalition has long advocated for increased transparency and responsiveness with respect to stakeholder inquiries about exemptions under section 333 of the FAA Modernization and Reform Act of 2012, waivers under 14 C.F.R. Part 107, and exemptions under section 44807 of the FAA Reauthorization Act of 2018. The Coalition has also urged the FAA to respect the privacy interests of UAS owners and operators in its promulgation of rules, policies, and guidance.

The Coalition appreciates the FAA’s statement that, upon completing the webform, an automated system email receipt will be sent, as the Coalition requested that a confirmation receipt be sent “in real time.” The Coalition reiterates its request that the webform contain instructions on how to complete the form, as this will reduce unintentional errors or omissions.

The FAA notes that it will reference the Support Center on “*FAA.gov/uas*, UAS events, community partnerships and social media[,]” which addresses the Coalition’s recommendation that the Support Center link be “prominently displayed.”

¹ Members of the Small UAV Coalition are listed at www.smalluavcoalition.org.

The Coalition also requested the FAA provide an opportunity for the requester to contact the FAA UAS Support Center, by phone, “in circumstances where a conversation may be needed to refine or explain a stakeholder’s inquiry or to explain the FAA’s response.” The Coalition welcomes the FAA’s commitment that the Support Center will be available by phone or email.

Finally, the Coalition applauds the FAA’s agreement to protect privacy interests as the Coalition urged, in (1) protecting personally identifiable information (“PII”) from public disclosure under the Freedom of Information Act – and by providing a notice to requesters not to provide PII information – and (2) providing that a member of the public will not be able to view the status of another stakeholder’s inquiry.

In sum, the Coalition believes the UAS Support Center Case Management System will improve the timeliness, transparency, and responsiveness of the FAA’s processes for petitions for waivers, exemptions, and other approvals. According, the Coalition fully supports the creation of the CMS and urges OMB to approve and clear this new information collection.

Respectfully submitted,



Gregory S. Walden
Dentons Global Advisors Government Relations LLC
1900 K Street NW
Washington, DC 20006
202-403-9904
gregory.walden@dentonsglobaladvisors.com
Counsel to the Small UAV Coalition

August 23, 2022