

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

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**IN THE MATTER OF**

**Request for Comments; Clearance of Renewed Approval of Information Collection:  
Application for Certificate of Waiver or Authorization**

**Docket No. FAA-2023-2372**

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**COMMENTS OF THE SMALL UAV COALITION**

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February 5, 2024

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**COMMENTS OF THE SMALL UAV COALITION**

The Small UAV Coalition<sup>1</sup> seeks clarification of the information collection renewal request in this proceeding involving applications for a certificate of waiver or authorization, FAA-2023-2372, 88 Fed. Reg. 84871 (Dec. 6, 2023), and the proceeding involving operational waivers for small unmanned aircraft systems, FAA-2023-2554, 89 Fed. Reg. 501 (Jan. 4, 2024).

In this information collection proceeding, which involves FAA Form 7711-2, the FAA estimates 26,495 respondents, “including approximately 5,500 annual applications for waivers from certain sections of part 107.” 88 Fed. Reg. at 84871-84872. The FAA estimated the burden per response to be 45.7 hours for part 107 waivers. However, the Paperwork Reduction Act statement for FAA Form 7711-2 estimates only 1 hour and 15 minutes per response, which includes “the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, [and] completing and reviewing the collection of information.”

In the other information collection proceeding, the FAA noted its introduction of the FAA DroneZone website in 2018. The FAA estimated 3,565 applications per year and estimated the average burden per response to be .65 hours (less than 45 minutes).

Neither FAA information collection notice refers to the other information collection notice. While the Paperwork Reduction Act’s purpose is to limit the paperwork burden on applicants, the Paperwork Reduction Act statement for FAA Form 7711-2 may be read to address the burden on the FAA (referring to the time “reviewing the collection of information”). The Coalition seeks confirmation that the average burden per response related to the burden on applicants and not the FAA.

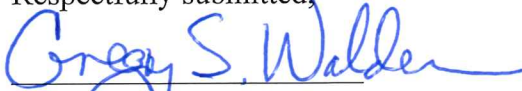
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<sup>1</sup> Members of the Small UAV Coalition are listed at [www.smalluavcoalition.org](http://www.smalluavcoalition.org).

One possible conclusion is that what might take a respondent 45 hours to complete FAA Form 7711-2 (notwithstanding the FAA's estimate of 1 hour and 15 minutes in its Paperwork Reduction Act statement), takes that same respondent under 45 minutes to complete a submission through FAADroneZone.

The Coalition acknowledges that some waivers are more complex than others, and both estimates of time are estimates of the "average" burden. Nonetheless, the Coalition seeks clarification of the purposes and applicability of the two information collection notices and the basis for the estimates of number of respondents and average time burden.

Respectfully submitted,



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