

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

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**IN THE MATTER OF**

**Request for Comments: Agency Information Collection: Proposals, Submissions, and  
Approvals: Operational Waivers for Small Unmanned Aircraft Systems**

**Docket No. FAA-2023-2554**

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**COMMENTS OF THE SMALL UAV COALITION**

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March 4, 2024

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

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

In the other 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 estimates 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.”

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

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

confirmation that the average burden per response in both proceedings relates to the burden on applicants and not the FAA.

One possible conclusion is that what might take a respondent under 45 *minutes* to complete a submission through FAADroneZone, it would take that same 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).

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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