



50 F St. NW, Suite 750
Washington, D.C. 20001

T. 202-737-7950
F. 202-273-7951

www.aopa.org

September 25, 2019

Mr. Syed Tahmid
Project Lead, Surveillance and Broadcast Services
Air Traffic Organization
Federal Aviation Administration
600 Independence Ave. SW
Washington, DC 20597

Re: FAA Docket No. FAA-2019-0630; Agency Information Collection Activities; Proposals, Submissions, and Approvals: Privacy International Civil Aviation Organization Address Program

Dear Mr. Tahmid,

The Aircraft Owners and Pilots Association (AOPA), the world's largest aviation membership association, respectfully submits the following comments in response to the FAA's notice to request Office of Management and Budget (OMB) approval for a new information collection regarding the use of the Privacy International Civil Aviation Organization Address (PIA) Program. AOPA strongly supports this FAA effort to facilitate privacy for aircraft operators who have equipped with 1090-MHz Extended Squitter Automatic Dependent Surveillance–Broadcast (ADS-B). We support the FAA's approach outlined in this Federal Register notice and we believe their requested new information collection should be approved. This is an important step as we get closer to the FAA's ADS-B mandate deadline of January 2, 2020, and ensuring general aviation pilots' concerns are addressed.

In an August 5, 2019, online poll of our membership, we asked "are you concerned about your privacy by transmitting your identification over ADS-B?" We received over 4,500 responses with more than 2,000 respondents, nearly half of those who participated, indicating a concern for their privacy when using ADS-B. The proliferation of privately-owned ADS-B receivers tied to large networks and flight tracking websites has dramatically changed the aviation privacy landscape and has been noticed by the broader pilot community.

AOPA has been actively engaged in the collaborative conversations with the FAA, the National Business Aviation Association (NBAA), the General Aviation Manufacturers Association (GAMA), and our other industry partners to find a solution that would enable anonymity for those civil operators using 1090-MHz ADS-B systems. This technology broadcasts an aircraft's unique International Civil Aviation Organization (ICAO) code and Flight ID, which can be captured by anyone with a suitable receiver. This information can then be used to determine who owns and operates the aircraft, and even track their movements globally.

A key part of this collaboration has been to ensure the solution would be practical for operators. The FAA notice states "owners and operators must verify that the ICAO 24-bit aircraft address (Mode S code) broadcast by their ADS-B equipment matches the assigned privacy ICAO address for their aircraft." We believe this can be accomplished without an operator needing to perform an unnecessary or expensive test flight in order to receive a Public ADS-B Performance Report (PAPR). At many airports the FAA does

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not have adequate surface coverage such that a PAPER would effectively indicate if the new ICAO code is correct, which might unintentionally require the operator to perform an unnecessary and expensive flight. The FAA should ensure the program allows operators to verify the new ICAO code is entered correctly without imposing an onerous verification requirement.

Additionally, we encourage the FAA to not make PIA program eligibility contingent on the aircraft owner or operator having a call sign. Call signs can be expensive to obtain and are not necessary to participate in other similar FAA privacy programs. It is not clearly noted in the Federal Register Notice that this information is needed so we do not believe it would be appropriate for the FAA to start requiring its collection.

In conclusion, privacy is a key issue for general aviation pilots and, as nearly 85% of aircraft owners are equipping with 1090-MHz ADS-B systems, it is important this effort move forward. The concept of temporary ICAO codes is a promising approach to increasing anonymity for general aviation operators. Emitting randomly assigned ICAO codes that will be changed periodically, in combination with an anonymous call sign, will make private aircraft harder to track by nongovernmental entities. This approach will allow aircraft owners to have privacy similar to what they enjoy when driving a car.

We support the FAA's PIA Program and we look forward to supporting the successful implementation of the program in any way we can. We believe international harmonization efforts with countries like Canada should continue to facilitate a privacy framework for all North America. We appreciate your continuing efforts to implement this important program. Please feel free to contact me at 202-509-9515 if you have any questions.

Sincerely,



Rune Duke
Senior Director, Airspace and Air Traffic