

July 31, 2026

Kevin West
Acting Division Manager
Civil Aviation Registry (AFB-700)
Federal Aviation Administration

Re: Implementation of Section 803 of the FAA Reauthorization Act of 2024

Dear Mr. West,

On behalf of the undersigned organizations representing hundreds of thousands of aircraft operators, we appreciate the Federal Aviation Administration's continued engagement with stakeholders regarding implementation of Section 803 of the FAA Reauthorization Act of 2024, Public Law 118-63.

We strongly support the FAA's efforts to faithfully implement Section 803 in a manner that both protects aviation safety and respects Congress's clear direction regarding aircraft owner data protection. We believe it is important for the Agency to continue stakeholder engagement as implementation proceeds.

Aircraft owner privacy and operator data security concerns are not theoretical. These aircraft frequently conduct sensitive missions, carry government officials, medical patients, humanitarian relief personnel, and other passengers whose safety and security may be compromised through unrestricted public access to ownership and other personal information. Our members have continued to express legitimate concerns regarding the FAA's aircraft registry enabling widespread dissemination of aircraft registration and personal information through data provided by live flight tracking technologies. The increasingly sophisticated methods by which publicly available registry information can be aggregated with other available databases to identify individual aircraft owners creates significant safety and security vulnerabilities.

Congress recognized these concerns when it enacted Section 803. The statute represents a deliberate policy decision to limit public dissemination of specified aircraft registration information while preserving the FAA's ability to provide access where legitimate governmental and operational needs exist.

The Federal Aviation Administration's Aircraft Registry was established by Congress under 49 U.S.C. Chapter 441 to promote aviation safety, establish ownership, record security interests, and support the orderly regulation of the national airspace. The registry was not created to serve as a database for other uses. While the FAA is required to maintain ownership records, nothing in the governing statute authorizes the agency

to facilitate activities by making aircraft owners' personal information readily available for any conceivable use.

The disclosure of owner data also raises significant concerns under the Privacy Act of 1974, 5 U.S.C. § 552a. Aircraft owners are legally required to provide their names, addresses, and other identifying information as a condition of registration. The Privacy Act reflects Congress's judgment that information collected by the federal government should be used only for purposes compatible with those for which it was obtained, absent clear statutory authorization to the contrary.

Enabling third parties to use FAA registry data constitutes a secondary use that bears little relationship to the purpose of the FAA's aircraft registration system. Allowing use of the data beyond statutory constructs creates foreseeable risks of unwanted solicitations, harassment, identity theft, and other privacy harms while undermining public confidence in the system and is juxtaposed to the intent of section 803 of Public Law 118-63.

We believe the FAA should interpret its existing statutory authority narrowly, follow the Congressional intent of section 803, and disclose only the reasonably necessary information to accomplish the purposes for which the aircraft registry was established.

We appreciate the FAA's continued engagement and look forward to working collaboratively toward an implementation framework that both fulfills Congressional intent and respects the data protection expectations of aircraft owners and operators.

Sincerely,

Aircraft Owners and Pilots Association
Experimental Aircraft Association
National Business Aviation Association
Vertical Aviation International