**Template Comment on UAS Remote ID: Registration**

I am writing in response to the FAA’s notice of proposed rulemaking on remote identification of unmanned aircraft systems (UAS). I am deeply concerned the proposed requirement to register all Recreational UAS (model) individually would impose significant costs on the recreational UAS (model) aviation community and place an undue burden on safe and responsible model aircraft hobbyists. Furthermore, if implemented as is, the requirement could deter compliance and therefore reduce the effectiveness of remote ID.

Individual UAS registration is a major issue for me and the recreational UAS (model) aviation community because of how many aircraft we own. On average, members of the Academy of Model Aeronautics (AMA) own nine aircraft each and some members own hundreds. Since we have so many model aircraft, many of them are flown infrequently – perhaps only a few times in the lifetime of the aircraft. And when we do fly an aircraft, it is always within visual line of sight, making it easy to identify the pilot at all times. Individual registration of recreational UAS may not accomplish what the FAA is intending.

Many operators of recreational UAS not only fly any one aircraft infrequently but also trade or sell aircraft often, so the requirement to register and deregister will become cumbersome. The current process would meet the FAA’s stated needs by simply adding a requirement to the registration process that the owner provides a number of aircraft to be operated. The simple addition of a second block to be filled in (the first on is being added since the FAA has proposed to require a telephone number) would provide the FAA with a much more accurate number of UAS being operated in the US.

If the proposal to register UAS individually goes into effect as is, AMA’s 180,000 members would be forced to register about 1.62 million aircraft at a cost of $8.1 million, assuming the $5 per aircraft registration fee does not increase over time. This is clearly a substantial investment of time and resources for our community, which has already faced challenges in recent years due to increasing regulations.

In conclusion, I urge you to remove the proposed requirement to register each UAS individually. At a minimum, the requirement should be removed for members of a community-based organization like AMA who have operated safely in the airspace for more than eight decades and already register with their organization.

Use this template to form your comment on the federal website [here](https://www.federalregister.gov/documents/2019/12/31/2019-28100/remote-identification-of-unmanned-aircraft-systems#open-comment).