

Dear members,

We're writing to let you know the FAA issued an [Interim Final Rule](#) today that will require drone pilots and model aircraft pilots to display their FAA-issued registration number on the outside surface of their aircraft. The rule will take effect on Monday, February 25, which means the markings must be in place for any outdoor flight beginning on that date.

Although most AMA members already have their FAA registration number posted on the outside of their aircraft, AMA will be submitting comments to the FAA requesting a waiver process for those who might be burdened by external markings, such as members who fly scale replica model aircraft. Most importantly, this rule does not change the original acceptable methods of external marking, nor does it specify a particular external surface on which the registration number must be placed. The requirement is simply that the registration number must be seen upon visual inspection of the aircraft's exterior.

As you know, the registration requirement is not new. Congress reinstated this requirement in December 2017 with the [passage](#) of the National Defense Authorization Act. Although this rule was flexible and allowed the registration marking to be placed in an enclosed compartment, law enforcement officials and FAA partners have expressed concerns about the safety risks a concealed explosive device could pose to first responders when opening a compartment to find a registration number.

If you would like to submit your own comment on the Interim Final Rule, simply visit www.regulations.gov and search for "RIN 2120-AL32." You can also visit www.faa.gov/news/updates/?newsId=93045 to learn more. The deadline for public comment ends on March 15, 2019.

If you are uncertain if you have a valid FAA registration, you can access your FAA account at <https://faadronezone.faa.gov/#>. This site will allow you to view your personal FAA registration number and expiration date. We strongly advise you to avoid registering your model aircraft anywhere other than the official FAA website. If you register under Section 336, there is a \$5 fee for a three-year registration, and hobbyists receive one identification number for all of their aircraft. Please be aware of unofficial registration websites that charge exorbitant fees or require separate registration fees for each recreational aircraft.

We continue to work closely with the FAA to determine the best path forward regarding recreational UAS operating requirements. As always, thank you for your continued support, and please reach out with any questions.

Thank you,
AMA Government Affairs

Additional AMA comments after contacting them early this week:

A couple of years ago, this was addressed in the General Section of the AMA Competition Regulations. Section 22 states: FAA (UAS) Registration Number Rule for Scale Aircraft.

For any category of Scale competition, there shall be no point deduction for marking an FAA Unmanned Aircraft System (UAS) Registration number on the aircraft. The FAA Unmanned Aircraft System (UAS) Registration Number shall be in a type font no larger than 3/8 inch in height.

Tony Stillman

You are correct, the Interim Final Rule for registration does not exclude any model from the new requirement for external FAA registration. We have addressed this concern with the FAA and have been informed that an exemption process is in place for those who want to preserve the original integrity of the aircrafts exterior. That being said, AMA will be officially submitting comments regarding an exemption process.

Tyler Dobbs

FAA Makes Major Drone ID Marking Change

[The Federal Aviation Administration](#) (FAA) posted a rule in the [Federal Register](#) requiring small drone owners to display the FAA-issued registration number on an outside surface of the aircraft. Owners and operators may no longer place or write registration numbers in an interior compartment. The rule is effective on February 25. The markings must be in place for any flight after that date.

When the FAA first required registration of small drones in 2015, the agency mandated that the registration marking be readily accessible and maintained in readable condition. The [rule](#) granted some flexibility by permitting the marking to be placed in an enclosed compartment, such as a battery case, if it could be accessed without the use of tools.

Subsequently, law enforcement officials and the FAA's interagency security partners have expressed concerns about the risk a concealed explosive device might pose to first responders upon opening a compartment to find a drone's registration number. The FAA believes this action will enhance safety and security by allowing a person to view the unique identifier directly without handling the drone.

This interim final rule does not change the original [acceptable methods of external marking](#), nor does it specify a particular external surface on which the registration number must be placed. The requirement is that it can be seen upon visual inspection of the aircraft's exterior.

The FAA has issued this requirement as an Interim Final Rule—a rule that takes effect while also inviting public comment. The FAA issues interim final rules when delaying implementation of the rule would be impractical, unnecessary, or contrary to the public interest. In this case, the agency has determined the importance of mitigating the risk to first responders outweighs the minimal inconvenience this change may impose on small drone owners, and justifies implementation without a prior public comment period.

The FAA will consider comments from the public on this Interim Final Rule, and will then review any submissions to determine if the provisions of the ultimate Final Rule should be changed. The 30-day comment period will end on March 15, 2019. To submit comments, go to <http://www.regulations.gov> and search for “RIN 2120-AL32.”

As Transportation Secretary Elaine Chao promised last month, the FAA also posted proposed new rules to let drones [fly routinely at night and over people](#), and to further [integrate them safely](#) into the nation’s airspace. **The comment period for these proposals is now open and ends on April 15.**