

PIA Articles of Use

Version 2, December 2020



Federal Aviation
Administration

To maintain the safety and integrity of air traffic operations in the National Airspace System (NAS), an aircraft operator is authorized to use a temporary assigned Privacy ICAO Address (PIA) subject to the following conditions and limitations:

1. Aircraft operators are only authorized to use the Civil Aviation Registry (CAR) ICAO address or the PIA assigned to an aircraft by the FAA.

An aircraft operation for which an aircraft emits a PIA not assigned to the aircraft is a compliance violation of 14 CFR § 91.227. An aircraft operator may use the registered ICAO aircraft address recorded in the CAR at any time for operations, including any time while having an active PIA assignment.

2. FAA will limit flight operations with a PIA to U.S. registered aircraft.

Reference "14 CFR Part 47 - AIRCRAFT REGISTRATION" for qualifications and steps to register an aircraft in the United States.

3. FAA will limit flight operations with a PIA to aircraft equipped with Mode S Extended Squitter (1090-MHz) ADS-B avionics that comply with the requirements defined within 14 CFR § 91.227.

Aircraft equipped with 978 Universal Access Transceiver (UAT) avionics are not permitted to operate with a PIA. This restriction also applies to aircraft equipped with dual 1090/UAT transmitters. [Aircraft that transmit on 1090-MHz, yet receive both links are authorized to use a PIA].

4. FAA will limit PIA assignment and use to aircraft not associated with open Flight Standards Service (AFS) Compliance, Administrative, or Legal Enforcement Actions.

Reference Title 49 of the United States Code (49 U.S.C.), Subtitle VII, Chapter 447 and accompanying regulations for minimum standards and requirements for flight of civil aircraft in air commerce.

5. Aircraft with a non-performing ADS-B 1090 emitter will not be assigned a PIA.

Aircraft flagged by the FAA's ADS-B performance monitoring system as not complying with the criteria spelled out in the ADS-B rule (14 CFR § 91.227) could be placed on a No Services Aircraft List (NSAL). Pilots can check the performance of their ADS-B systems online (<https://adsbperformance.faa.gov/PAPRRequest.aspx>) after a flight in airspace with ADS-B coverage. The FAA requires that the user validates that an ICAO code has been correctly installed into the aircraft's ADS-B avionics after each change associated with a PIA.

6. Flight operations with a PIA are limited to aircraft operating with a third-party call sign.

The third-party call sign policy and guidance is identified in Advisory Circular 120-26M – *Assignment of Aircraft Call Signs and Associated Telephonies*, Sep. 10, 2018. Alternate call signs are available from "Third-Party Call Sign Providers"; these are commercial service providers that have security agreements with the FAA.

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7. The aircraft operator must file flight plans for flight operations using PIAs with the aircraft's assigned PIA and third-party flight ID as they are installed in the aircraft's avionics.

The aircraft operator is not permitted to change the PIA or the third-party call sign during flight.

8. FAA limits flight operations with a PIA to U.S. domestic airspace.

U.S. domestic airspace is defined as "airspace which overlies the continental land mass of the United States plus Hawaii and U.S. possessions. Domestic airspace extends to 12 miles offshore."¹ Flight operations using PIAs are not permitted for flights to international destinations, nor does it apply to flights leaving domestic airspace to Hawaii, Alaska, or over the Gulf of Mexico. Flights must start, transit and terminate only within the territorial airspace of the United States (the airspace above the contiguous United States, Alaska, Hawaii, U.S. territories, and U.S. territorial waters). When using a PIA, flight operations are only permitted outside these airspace areas when temporarily directed by ATC, such as, but not limited to, vectoring to avoid weather, or while on departures/approaches from coastal airports. These provisions of air traffic services are separate from, and are not intended to support, operations or the regular filing of flight plans outside of domestic airspace.

Please refer to [FAA Order JO 7400.2 - Procedures for Handling Airspace Matters](#) and [80 FR 37710 Designation of Oceanic Airspace](#) for more information.

9. FAA Controller Pilot Data Link Communications (CPDLC) services should not be used for flight operations with Privacy ICAO Addresses.

CPDLC sessions currently require the aircraft's registration number to correlate communications between the aircraft and the CPDLC ground system. The availability of this information from the flight plan and subsequently within FAA automation would compromise the identity of the PIA operation for that aircraft.

10. All aircraft information held by the FAA which is associated with a PIA used primarily and predominantly for business or commercial purposes will be available from the FAA via the Freedom Of Information Act (FOIA) (5 U.S.C. § 552) upon request.

Note: The FAA does not consider PIA assignments used exclusively for commercial or business purposes confidential commercial information that is protected under Exemption 4.

PIA Rules of Use compliance:

Failure to operate within these PIA conditions and limitations can result in expulsion from the PIA program and/or the loss or restriction of the assignment of additional privacy assignments. An aircraft operator's participation in the PIA program is voluntary and failure to comply with these articles may impede or defeat the effectiveness of the program's privacy protections for that aircraft

¹ *Aeronautical Information Manual – Basic*, August 15, 2019, Pilot/Controller Glossary D-3, available at https://www.faa.gov/air_traffic/publications/media/pcg_8-15-19.pdf.

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operator. Upon detection of the first incident of misuse, the aircraft owner/operator will be issued a warning that requires immediate action to remedy the issue before the next operation involving the assigned PIA. Failure to comply may result in the loss of the PIA assignment and expulsion. Additionally, nothing herein supersedes or alters an aircraft operator's obligations as required by statute or regulation. Failure to comply with regulation or statute while participating in this PIA program may result in regulatory enforcement action by the FAA.