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Docket Operations, M-30
U.S. Department of Transportation (DOT)
1200 New Jersey Avenue SE
Room W12-140, West Building Ground Floor
Washington, DC 20590-0001
Submitted via <http://www.regulations.gov/>

Re: Request for Comment on FAA Proposal To Withhold Certain Aircraft Registration Information From Public Dissemination (Docket No. FAA-2025-0638)

The City of Palo Alto submits the following in response to FAA’s request for comment on its proposal to withhold certain aircraft registration data from public display on the FAA website.¹ The City of Palo Alto owns the Palo Alto Airport (PAO), one of the busiest general aviation Airports in the San Francisco Bay Area of California. Most of PAO’s users are transient; the airport does not serve commercial airline traffic.

FAA states it is considering the removal of registered owner information for private aircraft owners categorically rather than only upon request.² FAA says “[t]he removal of this data is intended to satisfy the requirement in section 803 of the FAA Reauthorization Act of 2024”.³ However, the categorical removal of registered owner information would go beyond the requirements of section 803, which only requires that FAA establish processes for withholding registered owner data “*upon request* of a private aircraft owner or operator.” 49 U.S.C. § 44114 (emphasis added). FAA should not remove this important data by default.

The airport utilizes registered aircraft owner information daily, both directly and indirectly through the [FAA Aircraft Inquiry](#) (“Aircraft Registry”). The loss of access to this aircraft registration data would greatly disrupt the airport’s ability to perform necessary functions.

First, PAO relies on Aircraft Registry data for noise mitigation. We partner with 1200.Aero, a third-party airport operations tracking software tool that relies on FAA Aircraft Registry data. The airport accesses registry data in response to noise complaints to identify and contact aircraft owners as appropriate. Airport staff regularly speak with individual pilots and aircraft owners to educate them

¹ 90 FR 14590 (FAA Docket No. FAA-2025-0638).

² 90 FR 14590 (“What would be the impact if the FAA removed such information for private aircraft owners categorically and permitted such owners to request copies of their information rather than removing such information only upon an individual request?”); *see also* FAA Newsroom, *FAA Moves to Protect Aircraft Owners’ Private Information* (Mar. 28, 2025), available at <https://www.faa.gov/newsroom/faa-moves-protect-aircraft-owners-private-information>.

³ *Id.*

about voluntary noise abatement procedures. This process would not be possible without access to Aircraft Registry name and contact information.

Second, PAO regularly uses Aircraft Registry data for tracking and billing airport users. PAO partners with Altaport, a third-party invoicing tool that assembles data on transient users for use in airfield surveillance and revenue collection. Altaport relies on FAA Aircraft Registry data to perform these functions.

Finally, without simple, direct access to Aircraft Registry data, it would be difficult for PAO and law enforcement to respond quickly to incidents requiring awareness of whose aircraft are on premises.

We recommend that FAA establish mechanisms to ensure that, even for data removed from public dissemination on the website, access remains available for airport sponsors. The City of Palo Alto uses the data to fulfill its sponsor obligations; any limitation to access to the data should not impede access for airport sponsors. This approach would be consistent with the intent of section 803 of the FAA Reauthorization Act of 2024 and would allow the City of Palo Alto to continue to fulfill its responsibilities and efficiently manage PAO.

Thank you for the opportunity to submit the comments herein for FAA's consideration.

Sincerely,

/s/ Brad Eggleston

Brad Eggleston

Director of Public Works

City of Palo Alto